

City of Bellevue ADA Self-Evaluation and Transition Plan

REVIEW DRAFT – Version 1.5 – 4-25-2016

Major changes from previous draft:

- incorporates some but not all of the internal and public review comments received to date
- section order and numbers changed (see below)
- recommendations section expanded and moved to the end
- executive summary added to Section 1
- previous Section 2 “A guide to this report” combined with exec summary in Section 1
- employment section moved up within Self-Evaluation, after public process and before communications

Comments are welcome, in any format and any level of detail.

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Bellevue welcomes the world. Our diversity is our strength.

Highlights are color coded:

YELLOW: Items to be inserted

TURQUOISE: Appendix items (may be re-numbered in final doc)

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Additional sections to be added in final document:

ACCESS NOTICE (inside front cover)

TITLE PAGE

MAYOR/CITY MANAGER LETTER

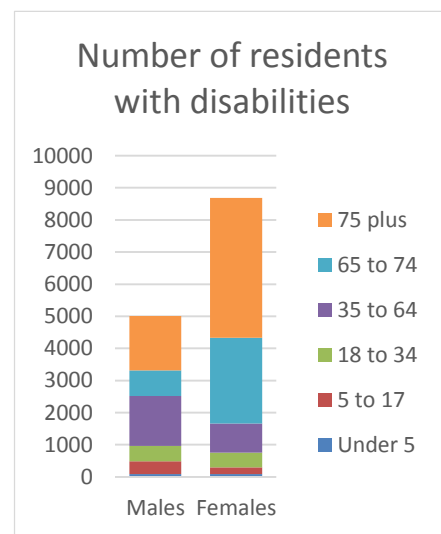
ACKNOWLEDGEMENTS – ADA team, community reviewers, other partners

1 EXECUTIVE SUMMARY

Introduction

The City of Bellevue is a growing and diverse community of more than 130,000, with thriving high-tech and retail districts surrounded by quiet residential neighborhoods. Census data indicates that nearly 15% of Bellevue residents live with a physical, developmental or intellectual disability, and these numbers are expected to rise as the population ages. The city's commitment to diversity, equity and inclusion are reflected in its vision statement, *"Bellevue welcomes the world. Diversity is our strength."* In 2014 the city adopted a Diversity Advantage Plan that included the goals of promoting access and compliance with the Americans with Disabilities Act (ADA) of 1990.

The ADA is a broad and comprehensive civil rights law that mandates equal opportunity for individuals with disabilities. It prohibits discrimination in access to jobs, public accommodations, government services, public transportation and telecommunications.



The City of Bellevue 2016 ADA Self-Evaluation and Transition Plan is the result of the ADA Core Team's re-evaluation of city programs, services, and facilities to determine the status of ADA compliance and prepare a roadmap for further improvement. It refreshes and expands upon previous ADA assessments and planning work.

ADA Requirements for state and local governments include:

- **ADA Coordinator:** Designate an individual to be responsible for ADA compliance and reporting.
- **Complaint Procedure:** Establish and publicize a procedure for resolving ADA complaints.
- **Notice of Nondiscrimination:** Inform the public of their rights and protections under the ADA.
- **Employment:** Provide reasonable accommodation for qualified individual with a disability.
- **Program Accessibility:** Ensure that all programs and services, when viewed in their entirety, are accessible to and usable by individuals with disabilities.
 - **Communication:** Ensure effective communication with people with disabilities affecting hearing, vision, or speech, including through the provision of auxiliary aids and services.
 - **Policy and Operations:** Make reasonable modifications to policies and practices.
 - **Integration:** Offer services in the most integrated setting appropriate.

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- **Physical Access:** Ensure that city infrastructure meets accessibility standards.
 - **City Facilities:** Make buildings, facilities and parks accessible.
 - **Streets and sidewalks:** Provide curb ramps and accessible paths of travel.
- **Self-Evaluation and Transition Plan:** Review each element above, identify barriers, and describe plans for removing and improving access. Develop in consultation with the disability community.

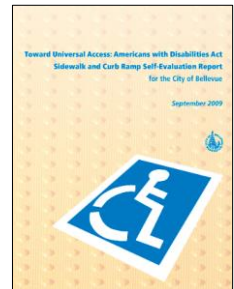
ADA Self-Evaluation Findings and Analysis

A history of innovation and commitment to access is reflected in the results of the City of Bellevue's 2016 ADA Self-Evaluation. Overall, most programs are responsive to public needs, staff show a strong interest in serving individuals with disabilities, and physical barriers have been consistently addressed and removed over time. The report identifies several best practices and opportunities for excellence. Many programs require further evaluation. Better coordination, more staff training, and more consistent integration of public input have been identified as ongoing needs.

Best Practices

Sidewalk and Curb Ramp Program

In 2009, Bellevue's Transportation Department developed an innovative method for surveying sidewalks and curb ramps using an Ultra-Light Inertial Profiler (ULIP) mounted on a Segway scooter. It generated more far more detailed and useful data at 30% of the cost of a traditional manual survey. The 2009 *Toward Universal Access: Americans with Disabilities Act Sidewalk and Curb Ramp Self-Evaluation Report* won a Transportation Planning Excellence Award in 2012, and the survey method has been adopted by a number of other jurisdictions.



Over 700 curb ramps were installed or upgraded between 2010 and 2015, and virtually all signalized intersections with sidewalks have curb ramps. Many older sidewalks have ramps that are now technically noncompliant because they met older ADA standards or were installed before standards were developed; these are being gradually replaced or upgraded. After a 2012 self-evaluation, the city has nearly doubled the number of Accessible Pedestrian Signals (APS) that provide audible or vibro-tactile signals for blind pedestrians; 68% of all signalized intersections now have APS. Overlay projects and community-responsive ADA projects will continue to remove barriers, with hundreds of ramp installations projected for the next five years. The Transportation Department's ADA team continues to develop consistent high-level technical practice standards.

Adaptive Recreation and Park Access

Bellevue's Adaptive Recreation program for people with disabilities is widely recognized as one of the best in the nation, and serves as a resource for residents of neighboring cities as well. The *Choices for People with Disabilities* Plan provides an outline of the options available, from adaptive recreation to varying levels of accommodation and inclusion in regular recreation programs.

The city has completed professional architectural assessments of ADA compliance at 16 facilities, including Highland, North Bellevue, South Bellevue, and Crossroads Community Centers, City Hall, Bellevue Aquatic Center and a number of park facilities. Most of the barriers identified in Phase I and II

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of the surveys have either been remedied or budgeted for improvement in the Parks Renovation and Refurbishment Plan. Phase III was completed in January 2016. Parks staff are working to further integrate the assessment findings with public input to determine future barrier removal priorities.

2015 Comprehensive Plan Update

The Comprehensive Plan guides city policy on growth and development and reflects the Council’s vision for the future of Bellevue. The 2015 update includes a thorough and thoughtful integration of diversity and disability issues in high-level policies and provides a strong foundation for implementation at all levels. Disability and access issues are mentioned in 21 policy items in eight subject areas; the 2010 plan contained only five disability-related items, mostly in human services.

Hearing Loop Installation

Bellevue has installed state-of-the-art hearing loop systems in City Hall in the City Council Chambers, Council Study Room and in Bellevue Youth Theatre. These systems enable people with hearing aids or cochlear implants to connect directly to the sound system with much better sound quality and amplification. People without a hearing aid can use receivers and headsets to benefit as well. The next phase will install loop systems in several community centers and other high-demand locations, and the old systems will be repurposed to provide access to the Youth Theatre amphitheater and City Hall concourse events.



Opportunities for Excellence

City of Bellevue Website Redesign

The city website is undergoing a comprehensive redesign in 2015-2016; this presents an opportunity to design a fully accessible site that would place Bellevue in the forefront of public website accessibility. The previous site architecture meets accessibility standards, but inconsistencies with third-party software integration and content accessibility pose barriers to many users, particularly for online transactions. Adopting a more rigorous version of web access standards would require some additional funding but yield significant results. For the budget equivalent of building one or two curb ramps, the city has the opportunity to go from good to great in this area.

Regional Coordination

Bellevue’s ADA compliance program is already being recognized regionally, and other cities have sought assistance or information on Bellevue’s park accessibility, hearing loops, and draft ADA plans. Bellevue has taken the lead in organizing regional collaboration among local ADA coordinators, and has the opportunity to leverage regional resources to improve accessibility and ADA compliance among other cities in the area.

Summary of ADA Self-Evaluation

Administrative Requirements

Bellevue’s ADA Coordinator is:

Jennifer Mechem, ADA/Title VI Program Administrator
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Bellevue's city website has an accessibility page:

<http://www.bellevuewa.gov/accessibility.htm>

The page contains:

- Name and contact info for the ADA Coordinator
- Nondiscrimination statements
- ADA complaint procedure
- Access and accommodation request forms
- ADA information and links to city documents, including ADA reports and background info

Public Engagement

- Robust community input programs in 2007 and 2009 informed the development of the Sidewalk and Curb Ramp Self-Evaluation.

Current efforts focus on input for the 2016 ADA Self-Evaluation and developing partnerships with individuals and organizations representing the full range of diversity in the disability community.

Program Accessibility

- All city programs were surveyed for accessibility in 2007; a new comprehensive survey is recommended to expand upon the qualitative assessments reflected in this report.

Employment

- The city provides reasonable accommodations to applicants and employees, and HR staff are knowledgeable about the ADA. Further study is required to develop formal policies and guidance on accommodations and to evaluate job descriptions, employment tests, and hiring practices.

Effective Communications

- Hearing loops in City Hall and Bellevue Youth Theatre improve access for those with hearing loss.
- Resource lists for ASL interpreters and live captioning (CART) have improved provision of these services.
- Greater consistency and staff training are required to ensure that event notices and city documents contain contact information to request accommodations or alternate formats (large print, Braille).
- TTY access to city phone lines is limited; staff need training on use of relay services, and the city should investigate technology options to increase TTY access in a way that best meets deaf residents' needs.
- City website access is good; content and transaction access could be dramatically improved during website redesign process. Bellevue TV content should be captioned and audio-described.

Policy and Operations

- Bellevue’s 2015 Comprehensive Plan does an excellent job of integrating disability access and diversity issues into larger policy and planning goals.
- Detailed review is recommended to identify ADA-related issues in the municipal code, licensing and permitting policies, and contracting and procurement regulations.

Emergency Management and Public Safety

- Community emergency management plans include a focus on vulnerable population planning, with staff expertise in disability issues. Partnerships with disability organizations can further strengthen this area; goals include first-responder training on disability and provision of text-to-911 services when feasible.
- Bellevue’s Police Department has a policy on effective communication with deaf and hard of hearing persons. Further review of Police and Probation are recommended to identify ADA-related issues.

City Facilities

- City facilities are generally quite accessible. Most identified barriers are included in future renovation or improvement plans, and public input is being sought to refine priorities for barrier removal.

Streets and Sidewalks

- Bellevue is making steady progress towards making all sidewalks and curb ramps fully accessible. Public input is being sought to refine priorities for barrier removal.

General Recommendations

- Develop a comprehensive staff training plan and consider ADA coordinators for each department.
- Consider establishing an ADA advisory body and a regional ADA Coordinators network.

A GUIDE TO THIS REPORT

The remainder of this report includes six major sections and appendices.

2. INTRODUCTION AND BACKGROUND

Section 2 lays the background for the rest of the report by describing Bellevue’s demographic and regional context, outlining the purpose and major provisions of the ADA, local nondiscrimination laws, and the requirements for ADA Self-Evaluations and Transition Plans.

3. BELLEVUE’S PAST AND PRESENT COMPLIANCE EFFORTS

Section 3 gives further background by recounting the city’s history in developing a self-evaluation and transition plan, and otherwise endeavoring to comply with the ADA.

4. SELF-EVALUATION

Section 4 is the bulk of the self-evaluation. Each topic is broken down into four sections:

- **ADA Requirements:** the basic legal requirements for compliance with this element of the ADA.
- **Self-Evaluation:** describes the content and findings of the self-evaluation process.
- **Areas for Further Evaluation:** items or issues that require further study or assessment.
- **Recommendations:** action recommendations based on what is known now or on best practices from other cities.

5. CITY FACILITIES TRANSITION PLAN

Section 5 describes the process of identifying barriers in city facilities, describes current efforts at mitigating the barriers or addressing them through program accessibility, and recommends plans for future barrier removal.

6. SIDEWALK AND CURB RAMP TRANSITION PLAN

Section 6 describes the process of assessing sidewalk and curb ramp accessibility throughout the city, describes current barrier mitigation efforts, and recommends plans for future barrier removal.

7. RECOMMENDATIONS

Section 7 highlights a few broad general recommendations that have emerged as themes during the process of compiling the self-evaluation and transition plan.

8. APPENDICES

The appendices include source documents, reference materials, and background reports, and details of plans or findings.

2 INTRODUCTION AND BACKGROUND

2.1 BELLEVUE BACKGROUND

The City of Bellevue, with a population of more than 130,000, is the second-largest city in the Seattle metro area and is the high-tech and retail center of the Eastside. Its thriving downtown and commercial districts are home to over 130,000 jobs in major companies, innovative startups, and retailers of all types. Yet Bellevue retains a suburban feel with tree-lined residential neighborhoods and an extensive network of parks, trails and greenways; it is often called the “City in a Park.”

Incorporated in 1953, Bellevue has grown beyond its agricultural and logging origins to become an increasingly diverse and cosmopolitan city. Nearly 40% of its population was born abroad, and over 84 languages are spoken in its public schools. This vibrant culture presents many opportunities and challenges as the City government strives to be responsive and proactively meet the needs of all residents.

The City of Bellevue’s Diversity Advantage Initiative was created to promote equity, access, and inclusion and to maximize the opportunity for growth and development of civic life. Improving access for people with disabilities is a key part of this program, and builds upon Bellevue’s prior achievements in program and facility access, adaptive recreation and pedestrian accessibility. Disability access is integrated with inclusion and outreach efforts focused on cultural competency and increasing diversity in employment, elected and appointed offices. The Diversity Advantage Program, and full implementation of the Americans with Disabilities Act (ADA) and Title VI of the Civil Rights Act have received strong support from City management and City Council.

In 2012 the City Council directed staff to study Bellevue’s diverse community culture and recommend a set of actions for the City to pursue. After researching best practices and engaging broadly with the community, the Diversity Initiative team developed a comprehensive report and a set of 60 recommendations to promote diversity and cultural competence. [\(Appendix A\)](#) One recommendation was to “dovetail the City’s existing accessibility and compliance programs (ADA, Section 504, Title VI) with the Diversity Initiative to achieve similar goals of increased performance and outcomes across all City services.” In May 2015, the City created a new Diversity Advantage Team and hired a team to fill three new positions: one devoted to community outreach and engagement, one to increase internal diversity and inclusion, and one part-time position to serve as a citywide ADA and Title VI Coordinator.

Bellevue as a whole is more affluent and better educated than many communities in Washington State and in the US, and therefore has a lower incidence of all types of disabilities: 8.4% of Bellevue’s residents report one or more disability, compared to 12.4% in Washington State and 12.3% in the US overall. This includes people of all ages, races, ethnic backgrounds, nationalities, religious beliefs, genders and sexual orientations. As in the rest of the country, Bellevue’s elderly population is growing

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rapidly, and a third of those over 65 report having some type of disability. Many have more than one disability.

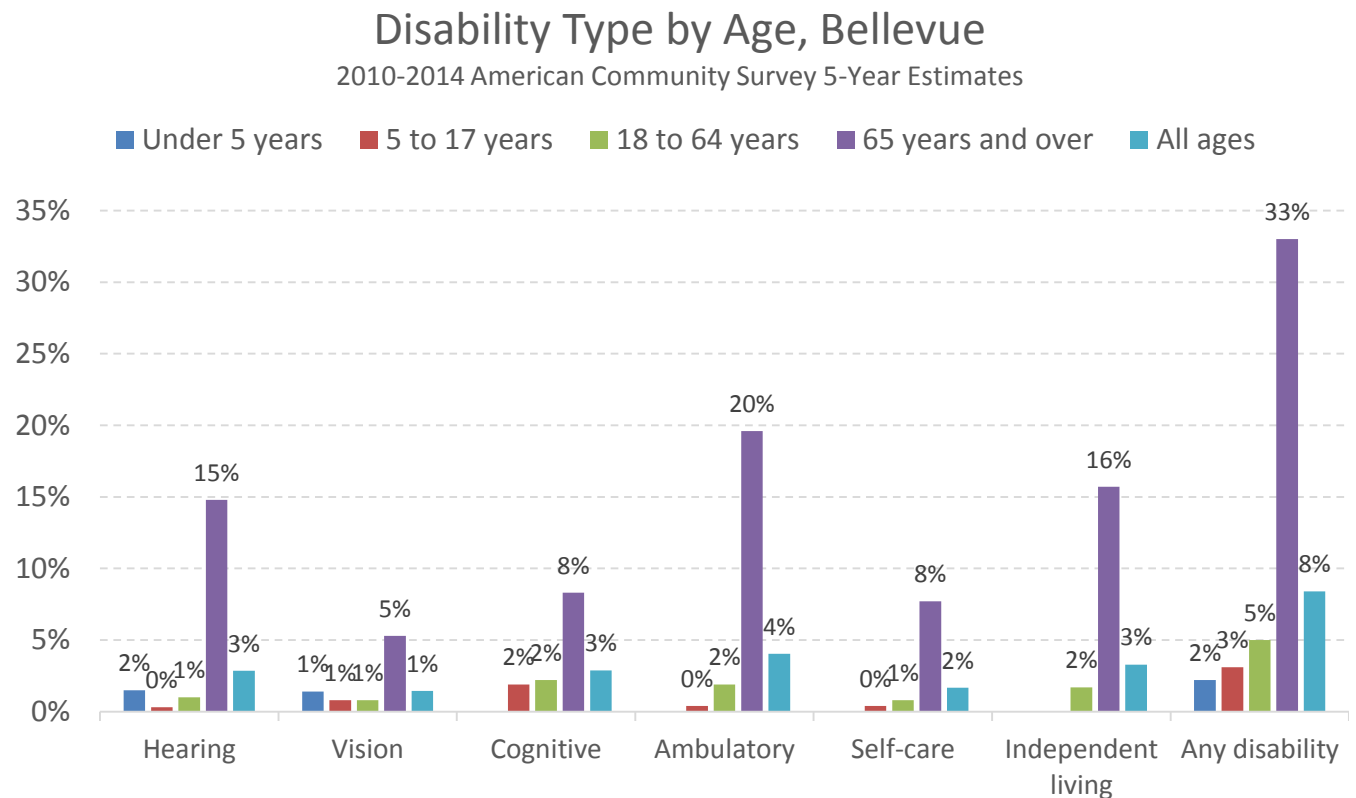


Figure 1. Disability by Age, 2010-2014 American Community Survey 5-year Estimates

The true impact of the ADA goes far beyond the numbers reported in census data, as its comprehensive civil rights protection extends to a much larger group of individuals with a civil-rights based definition of disability that is broader than the census criteria. ADA compliance thus provides benefits for a much larger segment of the population, sometimes estimated at close to 20%.¹ It also benefits those without disabilities who enjoy the convenience of curb cuts for strollers and bicycles, larger restroom stalls, TV captions in noisy restaurants or gyms, and the ability to age in place when universal design principles are applied to housing.

2.2 OVERVIEW OF THE ADA

On July 26, 1990, as he signed the ADA into law, President George H.W. Bush, declared, “Let the shameful wall of exclusion finally come tumbling down.” The moment was a culmination of years of

¹ US Census Brief: <https://www.census.gov/prod/3/97pubs/cenbr975.pdf>

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organizing and protests by people with disabilities, in one of America's least-known civil rights movements. Disabled activists marched on the Capitol, abandoned their wheelchairs and crawled up the Capitol steps to literally and symbolically highlight the lack of access. Under a banner with the words of Martin Luther King, "Injustice anywhere is a threat to justice everywhere," people spoke of being denied jobs, housing, and access to transportation, of being excluded from schools and universities, of being unable to shop in stores or told to sit in the back room of a restaurant, and of how stairs and curbs made it impossible to get around their hometowns. They spoke also of the attitudes and stereotypes that too often pushed disabled people to the margins and made them objects of pity and charity.

The ADA built upon the civil rights protections codified in Section 504 of the Rehabilitation Act that required recipients of federal funding to make their programs and services accessible to people with disabilities. The ADA extended these accessibility requirements to all businesses serving the public and to state and local governments regardless of receipt of federal funds. The ADA also protects people with disabilities from discrimination in employment.

Definition of Disability: One key to understanding the ADA is understanding how it defines a "person with a disability," and how that has been interpreted. A disability is a "physical or mental impairment that substantially limits one or more major life activity," but the three-prong definition includes individuals who have a record of such an impairment or are regarded as having such an impairment. Even well-meaning people may have misconceptions about what a person with a disability or perceived disability can and cannot do. By including "record of" and "regarded as" in the definition, the ADA addresses these perceptions and makes it clear that a person's actual abilities and needs must be evaluated on a case-by-case basis. In 2008, Congress passed the ADA Amendments Act² to clarify that the effect of mitigating measures such as hearing aids, glasses, or medication should not be included in the determination of whether an underlying impairment is "substantially limiting." For example, the ameliorative effects of the insulin a person uses must not be considered when determining whether that person's diabetes is a disability. The ADAAA expanded the scope and affirmed the original broad definition of disability in the ADA.

Title I of the ADA prohibits discrimination and requires employers to provide reasonable accommodation for all phases of employment for a qualified individual with a disability, including recruitment, hiring, benefits and compensation. State and local government employment follows the Title I regulations, which are developed and enforced by the US Equal Employment Opportunities Commission (EEOC).

Title II of the ADA covers state and local governments. It prohibits discrimination and requires that all programs, services, and activities be accessible to qualified individuals with disabilities, unless the individual poses a direct threat to the health and safety of others. Access may be provided by making reasonable modifications to programs and services, unless it requires fundamentally altering the nature of the service, program or activity. Public entities must also provide effective communication, which includes accessible websites and providing auxiliary aids and services such as sign language interpreters

² Americans with Disabilities Act Amendment Act, Pub. L. 110-325

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or materials in Braille or large format. Public entities must ensure that policies and eligibility criteria do not screen out individuals with disabilities. Public entities must provide access and meet relevant standards unless it can demonstrate an undue financial or administrative burden when looking at the resources of the entire entity, not just the specific office or department responsible for the program or activity. The US Departments of Justice (DOJ), Transportation (DOT), Education (ED) and other agencies develop regulations and enforce Title II.

Public facilities constructed or renovated after 1992 must meet the ADA Standards for Accessible Design; specific requirements depend on the date of construction or renovation, as the standards were updated in 2010 and regulatory guidance has been issued or revised several times for some items like curb ramps. Facilities pre-dating the ADA may need to be modified to the extent necessary to ensure that all programs and services are accessible when viewed in their entirety; access can be achieved by other means.

Title II also covers public transportation and the public right of way – sidewalks, curb ramps and pedestrian paths of travel – and applies to public transit agencies as well as to cities, counties, and other forms of local government. Maintaining an accessible pedestrian network and coordinating with transit providers is a major part of a city's obligations under Title II.

Title III of the ADA covers public accommodations, which includes businesses open to the public, private schools, and online-only businesses. It prohibits discrimination on the basis of disability and requires businesses and other covered entities to make reasonable modifications to policies, practices and procedures unless it requires fundamentally altering the nature of the goods or services provided. Public accommodations must also provide auxiliary aids and services as necessary to ensure access and effective communication for people with disabilities. Public accommodations constructed or renovated after 1992 must meet the ADA Standards for Accessible Design. For facilities pre-dating the ADA, barriers must be removed when readily achievable. The US DOJ develops regulations and enforces Title III.

A basic familiarity with the distinction between Title II and Title III requirements is important for City of Bellevue staff because residents and business owners frequently turn to the city with accessibility questions or an expectation that the city can enforce ADA compliance for anything within city limits. In many cases there are opportunities via permitting, regulatory or informational contact where the city can educate businesses about their ADA obligations and provide resources to encourage compliance.

Title IV of the ADA established nationwide telecommunications relay services to enable hearing- or speech-disabled persons to communicate with users of standard voice telephones. Relay services can now be reached in any state at any time by dialing 711.

Title V of the ADA contains miscellaneous provisions and clarifies some definitions.

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2.3 WASHINGTON STATE NONDISCRIMINATION LAW AND ACCESSIBILITY REQUIREMENTS

Washington State nondiscrimination law parallels the ADA but in some cases codifies more detailed requirements that are consistent with Federal guidance interpreting the ADA. The overarching Declaration of Civil Rights³ includes disability, and protects individuals from discrimination in places of public accommodation, employment, housing, credit and insurance, including health insurance. The expansive definition of disability⁴ is similar to the ADA's three-prong definition (has a disability, has a history of, or is regarded as having a disability), but explicitly lists many of the protections restored and delineated in the ADA Amendments Act, and specifically protects individuals who use service animals.

Washington State real-estate law has a nondiscrimination clause⁵ that prohibits any contract or covenantal restrictions based on disability, among other protected classes.

Institutions of higher education in Washington State must provide equal access and reasonable accommodations for students with disabilities. The Core Services Bill⁶ was passed in 1994 to provide additional guidance on how to comply with the ADA. The expansive list of Core Services does not establish new rights but describes in greater detail the types of services required for full access. It includes but is not limited to provision of interpreters, readers, note-takers and adaptive equipment, accessible facilities, and flexibility and modification of policies and procedures.

The State of Washington officially adopted the International Building Code (IBC) as its building code in 2004.⁷ The IBC includes provisions ensuring that public facilities are accessible to and usable by persons with disabilities.

2.4 ADA SELF-EVALUATION AND TRANSITION PLAN REQUIREMENTS

The ADA required state and local governments to conduct a thorough self-evaluation by 1993. A Self-Evaluation is a city's assessment of its current policies and practices. The Self-Evaluation identifies those policies and practices that are inconsistent with the requirements of Title II of the ADA. As part of the Self-Evaluation, the City is required to:

- Identify all of its programs, activities, and services.
- Review all the policies and practices that govern the administration of the City's programs, activities, and services.
- Examine each program to determine whether any physical barriers to access exist, including whether individuals with mobility impairments are provided access to public meetings.

³ RCW 49.60.030, Freedom from discrimination—Declaration of civil rights.

⁴ RCW 49.60.040, Definitions

⁵ RCW 49.60.224, Real property contract provisions restricting conveyance, encumbrance, occupancy, or use to persons of particular race, disability, etc., void—Unfair practice

⁶ RCW 28B.10.912, Students with disabilities—Core services described—Notice of nondiscrimination

⁷ RCW 19.27 and 70.92

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- Review its policies and practices to determine whether any have the effect of excluding or limiting the participation of individuals with disabilities in the City's programs, activities, or services. The Self-Evaluation should provide justification for any City policy that creates a barrier for people with disabilities that will not be modified.
- Review its policies to assess whether City communications with persons with disabilities are as effective as its communication with others.
- Review its policies for responding to requests for accommodations to ensure such requests are responded to expeditiously.
- Review its employment practices to assess whether they comply with other applicable nondiscrimination requirements, including Section 504 of the Rehabilitation Act and the ADA regulations issued by the Department of Justice.
- Review its building and construction policies to assess whether construction of each new facility or part of a facility, or alteration of existing facilities, conforms to the standards designated under the Title II regulations.

Once the City has identified policies and practices that deny or limit the participation of individuals with disabilities in the City's programs, activities, and services, the City should take immediate remedial action where possible to eliminate these barriers and provide full access. Structural modifications that are required for program accessibility should be made as expeditiously as possible.

The City is required to accept comments from the public on the Self-Evaluation and is strongly encouraged to consult with individuals with disabilities and organizations that represent them to assist in the Self-Evaluation process.

As it may not be possible to make every desired change immediately, the Self-Evaluation recommendations will be used as a guide in formulating a transition plan, which will identify high priority actions, their costs and the timeframe for implementing them.

The City's transition plan should, at a minimum, contain the following:

- A list of the physical barriers in the City's facilities that limit the accessibility of its programs, activities, or services to individuals with disabilities;
- A detailed outline of the methods to be utilized to remove these barriers and make the facilities accessible;
- The schedule for taking the necessary steps to achieve compliance with Title II. If the time period for achieving compliance is longer than one year, the plan should identify the interim steps that will be taken during each year of the transition period; and
- The name of the official responsible for the plan's implementation.

A copy of the transition plan must be made available for public inspection.

3 BELLEVUE'S PAST & PRESENT COMPLIANCE EFFORTS

3.1 HISTORY OF COMPLIANCE

The City of Bellevue has a longstanding commitment to providing full access to all its programs, services and activities, and has sought to improve its policies and practices over the years. The following timeline details some of the city's accessibility efforts over the past 25+ years and provides background for the current self-evaluation and transition plan.

- 1988 Conducted self-evaluation focused primarily on Community Development Block Grant and Human Services programs.
- 1990 Hired the Washington Coalition for Citizens with Disabilities (a Center for Independent Living now called the Alliance of People with Disabilities) to conduct an 18-month evaluation of all its programs, policies, procedures, communications, and facilities.

Funded efforts to address identified physical barriers and to revise programs to increase accessibility.
- 1991 Planning Department developed a citywide self-evaluation largely focused on personnel and policies.
- 1992 City Council passed a resolution adopting a policy of compliance with the ADA and establishing a nondiscrimination policy and compliance program.

Established citywide ADA Task Force.
- 1993 Parks Department conducted a self-evaluation of all buildings considered to be accessible to the public and developed an action plan.
- 1994 Projects to address findings in the Parks Department self-evaluation were scoped and funded.
- 1997 The city received a Certificate of Appreciation from the Governor's Committee on Disability Issues and Employment for its focus on making facilities accessible, addressing access barriers for internal and external customers, and providing flexibility in the workplace.
- 2003 Transportation Department began installing truncated domes on curb ramps.
- 2004 The US Department of Housing and Urban Development conducted a review of the City Hall complex and found the city to be in good compliance with only minor changes required.
- 2005 Transportation Department conducted an inventory of the city's curb ramps and evaluated the degree of compliance.
- 2006 The Federal Highway Administration conducted a statewide ADA Process Review of 20 selected agencies, including the City of Bellevue. Bellevue was highlighted for best practices related to staff training and accessible facilities in construction zones but encouraged to improve documentation associated with the ADA program.

The citywide Section 504/ADA Coordinating Committee re-formed and began to plan a self-evaluation of the city's programs and facilities.

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- City of Bellevue website was redesigned with new accessibility requirements and content guidelines.
- 2007 The citywide ADA/Section 504 Coordinating team produced a “2006 ADA/Section 504 Implementation Report” in February 2007.
- More than 100 managers across the city completed an ADA survey about policies and practices on providing access and/or accommodations for public participation in their department’s programs or services.
- Three public focus groups gathered information on transportation and accessibility issues from people with mobility disabilities, blind or visually impaired, and deaf or deaf/blind.
- 2008 ADA facility accessibility surveys performed by Endelman & Associates, an architectural accessibility firm. Phase I covered Highland Park Community Center & Recreation Areas, North Bellevue Community Center and a path of travel for City Hall.
- 2009 *“Toward Universal Access: Americans with Disabilities Act Sidewalk and Curb Ramp Self-Evaluation Report”* released. Bellevue’s Transportation Department, in partnership with the Federal Highway Administration (FHWA) and King County, developed an innovative method for surveying sidewalks and curb ramps using an Ultra-Light Inertial Profiler (ULIP) mounted on a Segway scooter. It generated more far more detailed and useful data at 30% of the cost of a traditional survey using manual measurements.
- Public outreach efforts, including an ADA Open House and a public survey of King County Metro Access Services customers, gathered information to help prioritize general access improvements and to rank curb ramp and sidewalk barriers identified in the Self-Evaluation Report.
- 2012 *“Toward Universal Access: Americans with Disabilities Act Sidewalk and Curb Ramp Self-Evaluation Report”* won a Transportation Planning Excellence Award, sponsored by the Federal Highway Administration and Federal Transit Administration and co-sponsored by the American Planning Association and Transportation Research Board.
- Transportation Department completed an *“Accessible Pedestrian Signals (APS) Self-Evaluation.”* It examined all signalized intersections, assigned priorities for additional APS installation and evaluated existing APS for compliance.
- Second round of ADA facility accessibility surveys performed by Endelman & Associates, an architectural accessibility firm. Phase II covered ten facilities, including City Hall interior, the Bellevue Aquatic Center and several community centers and parks.
- 2014 Diversity Advantage Plan released, with recommendations to increase resources for ADA compliance and hire an ADA Coordinator.
- 2015 Three staff hired for Diversity Advantage Team, a part-time ADA/Title VI Coordinator, and two full-time positions for Outreach & Engagement Coordinator and Diversity & Inclusion Coordinator. Funding allocated for diversity and compliance efforts.
- The City of Bellevue issued a proclamation to commemorate the 25th Anniversary of the ADA and joined other cities to sponsor a regional celebration in downtown Seattle on July 22, 2015.

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2016 Third round of ADA facility accessibility surveys performed by Endelman & Associates, an architectural accessibility firm. Phase III covered South Bellevue Community Center and Mercer Slough Environmental Education Center.

3.2 ADA SELF-EVALUATION AND TRANSITION PLAN DEVELOPMENT

This report builds upon many ongoing efforts to improve accessibility in the City of Bellevue over the years, as described above. Individual departments and teams have done some excellent self-evaluations and assessments of specific parts of the city, but without central coordination and dedicated resources, the follow-through and implementation has been inconsistent. It is a testament to the organizational culture of innovation and customer service that so many staff over the years have worked on ADA projects in addition to their assigned duties, in some cases with limited support from prior management.

In early 2014 the Section 504/ADA Coordinating Team developed a draft ADA Self-Evaluation and Transition Plan that incorporated the results of a departmental survey of program accessibility, public outreach efforts, and assessments of city facilities, sidewalks, curb ramps and accessible pedestrian signals. This report includes material from that draft and adds more recent information and analysis. While some of the data is several years old, it is worthwhile to include as it sets a baseline for a more comprehensive evaluation and recommendations moving forward.

In 2015, with a new ADA Coordinator on board and several membership changes, the ADA team was reconstituted as the ADA Core Team to update the prior draft and develop a final ADA Self-Evaluation and Transition Plan. The team reviewed best practices and ADA self-evaluations and transition plans for a number of other cities and counties as well as sharing resources and data with the Diversity Advantage Team and its citywide assessment of cultural competence and diversity needs. One immediate task was to update the data and develop concrete plans for using the results of the prior ADA program surveys, facility surveys, sidewalk, curb ramp and pedestrian signal self-assessments. Some barriers have already been removed in the intervening years, and changes in facility use or urban development patterns require re-prioritizing many of the findings.

The team therefore concentrated on identifying:

- Information that can still provide useful direction;
- Areas requiring further study and evaluation; and
- Action recommendations based on current knowledge.

In some cases, it is more useful to identify best practices and proactively establish proven access policies and resources than it is to spend additional time examining every detail of current activities. Informal assessments have provided enough of an update to support making recommendations in many areas without re-surveying each program.

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While it is important to put one's own house in order, updating the ADA self-evaluation has also revealed areas where the City of Bellevue's regional activities and partnerships may create both an opportunity and an obligation to address access barriers on a larger scale. For example, as part of the eCityGov Alliance, Bellevue developed and maintains the GovJobsToday website used by 12 local jurisdictions. Some job postings use the GovJobsToday interface but some link to recruitment firms or to NeoGov application software. If Bellevue takes the lead to ensure that all of its own job postings are fully accessible to applicants with disabilities, it would also affect the accessibility of job postings for the other regional members of the eCityGov Alliance.

3.3 ADA COORDINATOR

The ADA Coordinator is responsible for promoting and monitoring compliance with Title II and investigating any ADA complaints or grievances filed against the agency. All public entities with more than fifty employees must designate an ADA Coordinator, but there is no requirement that it be a full-time position. The City of Bellevue is committed to full compliance, so in 2015 it created an ADA Coordinator position dedicated primarily to ADA implementation. Previously this function was carried out by the Human Resources Director as an addition to his/her primary job duties. Upon hiring an ADA Coordinator as part of the Diversity Advantage Team, the position was re-designated. A copy of the official designation is in [Appendix B](#).

The City of Bellevue's ADA Coordinator is:

Jennifer Mechem

ADA/Title VI Civil Rights Program Administrator
City of Bellevue
450 110th Ave NE
Bellevue, WA 98004

jmechem@bellevuewa.gov
(425) 452-4471 voice
TTY users: dial 711 for relay

To further ensure that the city stays current with ADA requirements and to assist with implementation, several ADA related teams meet regularly. The ADA Core Team consists of subject matter experts and representatives from departments with significant ADA compliance responsibilities, and plays a key role in maintaining the city's commitment to full implementation of the ADA. Members of the ADA Core Team were instrumental in developing this self-evaluation report and transition plan.

Departmental and function-oriented teams also focus on accessibility. The ADA Transportation Planning Team (ADAPT) with representatives from all Transportation Department work groups meets monthly to coordinate projects and policy approaches related to the public rights of way and other infrastructure ADA issues. The Parks and Community Services Department has a team from its Recreation Division that

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develops and administers its Choices Plan for program inclusion. A facilities access team with representation from several Parks divisions coordinates accessibility improvements at parks buildings, playgrounds, and outdoor recreation areas.

3.4 COMPLAINT PROCEDURE

The City of Bellevue is dedicated to ensuring that all city programs, services, benefits, activities and facilities operated or funded by the city are fully accessible to, and useable by, people with disabilities. Individuals with disabilities are encouraged to request accommodations or ask for help from any city employee as well as from the ADA Coordinator. Residents are encouraged to notify the city of any access problems they discover, even if it does not pose a barrier to them personally. The city makes every effort to respond promptly and appropriately, and appreciates the opportunity to correct access problems as soon as possible and to be proactive about removing barriers.

Service Requests and Informal Complaint Process

Accessibility or accommodation requests may be made by any means convenient to the requestor: in person, over the telephone, by letter or email, or through the City of Bellevue website. Service First staff at the City Hall front desk and main phone line can refer requests and questions to the appropriate person immediately, and are usually able to find someone who can assist even if the first contact is out of the office or unavailable.

The accessibility page on the city website has an online form to request accommodations or notify the city of a problem, and a link to email the ADA Coordinator directly. There is also a downloadable form specifically for curb ramp requests, and contact information for the Transportation Department Curb Ramp Program Manager.

The accessibility request page is: http://www.bellevuewa.gov/accessibility_requests.htm

Formal Complaint Process

The City of Bellevue takes its ADA responsibilities seriously and attempts to resolve problems or complaints quickly and correctly. If an individual feels that a request or complaint has not been handled satisfactorily, he or she may file a formal complaint alleging discriminatory treatment or failure to accommodate.

Formal complaints regarding accessibility issues or discrimination on the basis of disability must be addressed in writing to the City of Bellevue's ADA Coordinator listed above. The complaint must be filed within 180 days of the alleged occurrence. There is no required format but a written complaint should include the name, address, and contact information of the complainant, the date of the incident and the reason for the complaint.

All public entities with fifty or more employees must establish and publicize a procedure for resolving complaints and grievances under Title II of the ADA. Information about the complaint procedure and a

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link to the City of Bellevue ADA Complaint Procedure Guide are on the ADA grievance procedures page of the city website: http://www.bellevuewa.gov/ada_grievance_procedures.htm.

A copy of the online Accessibility Request form, the Curb Ramp request form, and the ADA Complaint Procedure Guide are in **Appendix C**.

3.5 PUBLIC NOTICE OF NONDISCRIMINATION

The City of Bellevue's commitment to equity, access, inclusion and opportunity should be reflected in all its communications with the public. "Bellevue welcomes the world. Our diversity is our strength," is a key message about the city's identity, and disability access is an integral part of the conversation around diversity. The ADA requirement to inform the public of the rights and protections afforded by the ADA for access to public programs, services, and activities is directly in line with these larger goals. This obligation to notify individuals with disabilities of their rights under the ADA is separate and distinct from the obligation to provide information about available access provisions or services, or about complaint procedures.

The city uses a number of methods to notify residents of accessibility and accommodation options, though often not in the context of notifying them specifically of their rights under the ADA. The city website has an accessibility link on the front page, on par with other major topical and departmental links, with a statement that accommodations are available, links to accessibility request forms and complaint procedures, and contact information for the ADA Coordinator. Many departments and public programs include an accommodation notice on their websites, brochures, or public information materials, though the language is not consistent across the city. A few city facilities have signs or posters about access or ADA compliance.

The City of Bellevue, like many local cities with similar government structure (First-Class Non-charter Code city) does not have a single general nondiscrimination policy that it can publicize and that could include an ADA rights notice. The City Council has twice officially declared its support of the ADA: in 1992 it passed a resolution adopting a policy of ADA compliance and nondiscrimination; and in 2015 it issued a proclamation celebrating the 25th anniversary of the ADA and reaffirming a commitment to full compliance. Both documents are in **Appendix D**.

There are several actions the city could take to improve public notice of ADA rights:

- Establish a general declaration of human rights or civil rights, explicitly referencing the ADA and disability rights among other statutes or protected classes, and broadly publicize it.
- Create a beautiful and visually distinctive "Your rights under the ADA" poster for display in city offices. The State of Washington in 1992 created a poster with a large image of artist Dale Chihuly's glass vase and the title, "Knowing Your Rights is a Beautiful Thing," with simple and

3. BELLEVUE'S PAST & PRESENT COMPLIANCE EFFORTS

clear text explaining the ADA's protections. This poster was widely distributed and remains on display in some state offices to this day.

- Develop a standardized short disability nondiscrimination clause for insertion into appropriate locations in websites, facilities, and publications. It should also include contact information for accommodation requests.

4 SELF EVALUATION

4.1 PUBLIC PROCESS AND INPUT

ADA Requirements:

The city is required to seek public input and comments in the process of developing a self-evaluation and in prioritizing barrier removals for a transition plan. The disability community should be engaged in all aspects of developing accessibility programs.

Self-Evaluation:

Over the course of several issue-specific self-evaluations and transition plan, and of developing a draft citywide self-evaluation, community engagement efforts have taken many forms. In the early 1990s, the city sponsored several open houses and other disability awareness events.

In December 2007, prior to launching the formal inventory effort on the public rights of way, city staff conducted three focus groups with different constituencies to learn what challenges they faced and what was important to them for the city to focus on in planning for accessibility enhancements. The focus groups, held at the Highland Community Center, included people with motor disabilities, people who are blind or visually impaired, and people who are deaf or deaf/blind. [Appendix E](#) includes a summary of the input received from participants.

After all the data was collected for the pedestrian facilities assessment, clients of King County Metro Access went on a field tour with staff to help them understand and prioritize access issues during the barrier ranking analysis.

In April 2009, the City hosted an Accessibility Open House with a broad “Share — Learn — Do” approach. Attendees were given opportunities to share thoughts on the transition planning process through a variety of formats. Participants learned about programs and services available to them and their families and saw demonstrations on the latest technologies. Attendees also had first-hand experience playing a hole of accessible golf, trying assisted listening devices, and using an interactive mapping system. The informational Flyer for the Open House is included in [Appendix F](#).

In May and June 2009, the City of Bellevue partnered with King County Metro Access Services to survey more than 800 Bellevue residents who use Metro Access paratransit service. The purpose of the survey was to evaluate the current level of accessibility in the city so that identified areas of improvement could be prioritized as part of the city's ADA Transition Plan update. The survey was also made available on-line and in large print formats. [Appendix G](#) provides a summary of the 110 responses received.

In 2015 and early 2016, the city began to update its public outreach process and compile more current lists of community members and organizations to participate in public input processes.

4.1. SELF EVALUATION: Public process and input

As a result of participation in the ADA 25th Anniversary celebration in July 2015, relationships were built with many disability consumer and advocacy organizations as well as local government personnel. ADA coordinators and disability service managers in nearby cities and counties were identified. The City of Bellevue co-hosted the State Independent Living Council’s public hearing on the State Independent Living Plan. The city also participates in the King County Mobility Coalition and the Eastside Easy Rollers subcommittee to address transportation issues for disadvantaged populations, including people with disabilities, homeless, low-income, and limited English proficient individuals and communities. The Diversity Advantage Team’s Outreach and Engagement coordinator has actively built relationships with organizations and individuals representing the broad ethnic, linguistic and cultural diversity in Bellevue, and there are many opportunities for partnership.

The city has identified a group of 8-10 people with appropriate skills and knowledge to help with prioritizing its sidewalk and curb ramp transition plan; nearly all are people with disabilities. It is also assembling a larger mailing list of interested persons for news and information about city ADA and access-related activities, and will use this to publicize broader public engagement opportunities and seek input on a variety of access issues.

Areas for Further Evaluation:

- ✓ Continue to share outreach and engagement resources with other programs and departments within the city to identify other areas for collaboration and further contacts within the disability community. Leverage existing public outreach and comment programs and examine their data for relevance to ADA compliance efforts.

Recommendations:

- Continue to build relationships with other local organizations working on disability-related topics, such as King County Library, Bellevue School District, Bellevue College, human services agencies and disability advocacy organizations.
- ✓ Identify best practices for outreach and public engagement with individuals with disabilities, both locally and nationally, and model our public outreach programs on those.
- Share resources with ADA Coordinators and ADA programs at other local government agencies and seek input on developing effective public outreach programs. Follow up on initial contacts with King County Metro Transit about sharing mailing lists for accessibility testing.
- Plan and execute one or more large public events to gain input on the ADA Self-Evaluation and Transition Plan, develop further recommendations and identify issues in the community that could be addressed in future plans.
- Specifically engage the diversity of Bellevue’s community by holding one or more events focused on how different cultures understand what we think of as “disability.” Possible partners include

4.1. SELF EVALUATION: Public process and input

the Cultural Conversations program, local colleges, senior centers, and ethnic/cultural/religious organizations. Examine intersections between disability, aging, education, family structure, and disparities of resources and information available in different communities.

4.2 EMPLOYMENT

ADA Requirements:

Title I of the ADA prohibits discrimination in all employment practices, including job application procedures, hiring, firing, advancement, compensation, training, and other terms, conditions, and privileges of employment. It applies to recruitment, advertising, tenure, layoff, leave, fringe benefits, and all other employment-related activities.

Self-Evaluation:

Human Resources currently provides staff with information and the process on types of reasonable accommodations, such as job restructuring, modified work schedules, assistive devices and services for accessibility. The city also provides reasonable accommodation for completing employment applications upon request.

Areas for Further Evaluation:

- ✓ Review the process for developing essential functions in job descriptions to ensure they do not unintentionally exclude persons with certain disabilities, and make clear what functions must be performed with or without accommodation, versus what can be modified or reassigned.
- ✓ Evaluate and review notifications to staff and applicants for awareness on changes and or adjustments that the city will provide to allow qualified applicants or employees with a disability to participate in the job application process, to perform the essential functions of a job, or to enjoy benefits and privileges of employment equal to those enjoyed by employees without disabilities.
- ✓ Evaluate job applications availability in alternative formats upon request.
- ✓ Conduct review on employment tests to ensure they reflect job skills or aptitude.
- ✓ Review benefits to ensure they do not prevent employee participation on the basis of disability.

Recommendations:

- Review best practices in other cities and adopt a formal reasonable accommodation policy and procedure for employees.
- Develop guidelines to evaluate current and new technology used for staff and applicants and provide solutions for accessibility.
- Provide additional notification on city websites on accommodations for both staff and applicants.

4.3. SELF EVALUATION: Effective Communication

- Consider re-establishing a supported-employment program to promote hiring individuals with disabilities. Evaluate partnerships with supported employment agencies.

4.3 EFFECTIVE COMMUNICATION

ADA Requirements:

The city must ensure that its communications with individuals with disabilities are as effective as communications with non-disabled people, and must provide auxiliary aids and services, alternate formats, or modifications to policies and practices as necessary to achieve effective communication.

Self-Evaluation:

Departmental survey results indicate that nearly all staff are aware that they may need to make reasonable modifications to programs, services or policies in order to serve people with disabilities. While this survey data is from 2007, it is consistent with observations of staff knowledge and behavior throughout city departments in 2015 and 2016. The city's strong focus on customer service and a high standard of responsiveness continues to guide staff interactions with the public, and frequently results in staff proactively seeking solutions and assistance when confronted by accessibility issues.

Unfortunately, the willingness to help is not always matched by knowledge and resources for providing effective communication through alternate formats or auxiliary aids and services. For example, a very small minority of survey responses indicate presence of print materials in alternate formats or awareness of how to make them available. Nearly half of Parks & Community Services respondents indicated awareness, but only one-fourth reported that alternative formats or auxiliary aids and services were available. Other departments' responses showed little or no availability or awareness, with the exception of Planning & Community Development and Police, which had a handful of positive responses to these questions.

More detailed evaluations and recommendations for the following types of auxiliary aids and services are listed below:

- Alternate formats for written materials
- Telecommunications: TTYs and Relay Services
- Assistive listening systems
- Interpreters and captioning

4.3.1 Alternate Formats for Written Materials

ADA Requirements:

"Alternate formats" refers to providing material or content in a format that is more usable for a person with a disability. For written or printed materials, this will most often be an electronic version as the user can manipulate the text or images. PDFs and image-based files require specific accessibility features that can usually be generated with standard office software. Large print versions of printed materials

4.3. SELF EVALUATION: Effective Communication

are another common alternate format, with Braille or audio versions less common and more difficult to produce.

Current levels of staff awareness and availability of alternate formats for print and written materials are likely similar to those revealed in the 2007 survey. Staff in some departments report being asked by customers or partner organizations to make flyers and event announcement accessible for electronic distribution. Many printed or electronically distributed documents produced by the city do not have a notice that they are available in alternate formats upon request. All documents should have such a notice, in a minimum XX font size.

Areas for Further Evaluation:

- ✓ Gauge current staff knowledge of alternate formats and auxiliary aids & services, either by survey or interviews. Determine whether members of the public are sufficiently informed by the signage or notifications to know that they can ask for materials in alternate formats.
- ✓ Review current guidelines on producing large print and accessible PDFs for ease of use and effectiveness in producing accessible results.

Recommendations:

- Improve standardized notices for all printed documents indicating that they are available in alternate formats, perhaps with some variations for type of document.
- Develop and post guidelines & resources for staff on how to format large-print documents and how to create other alternate formats when requested.
- Support Graphics and IT staff in developing expertise in producing alternate formats so they can serve as resources and technical experts for program staff.

4.3.2 Telecommunications: TTYs and Relay Services

ADA Requirements:

Telephone communications must be equally accessible to individuals with disabilities, and staff must be able to communicate effectively with deaf and hearing or speech-disabled people using TTYs or the telecommunications relay service.

Self-Evaluation:

The Police Department consistently ranked the highest in percentage of employees knowing how to use a TTY and the relay service, with Parks a close second in the 2007 survey. Current observations indicate that many staff are unfamiliar with the relay service and unsure of how to handle incoming calls from customers using the relay. The city does not regularly use TTYs in public contact offices, and relies

4.3. SELF EVALUATION: Effective Communication

almost entirely on stating, “Use 711 for relay service” on public notices rather than listing a TTY number. Very few TTYs are currently in use with published numbers.

Areas for Further Evaluation:

- ✓ Perform a current assessment of staff knowledge and practices with using relay services, in order to devise effective information and training measures.
- ✓ Gather input from hearing- and speech-impaired community members on their needs and preferences when communicating with the city: is there a decreased need for dedicated TTY numbers now that email, text, mobile TTY and relay apps, and online information is more widely available? Or do community members have a strong preference for maintaining dedicated TTY numbers?

Recommendations:

- Train staff on use of the relay service and make information and resources readily available to staff and the public.
- Ensure that all listings of city telephone numbers contain a note about using 711 for the relay service, and list any functioning TTY numbers
- Investigate the possibility of acquiring an enterprise-wide TTY software app such as NexTalk to provide virtual TTYs available on every computer and integrated into current communications software. If staff are trained on its use, this could prove a cost-effective and flexible method for providing substantially better TTY access and increase the usefulness of existing TTY numbers.

4.3.3 Assistive Listening Systems and Hearing Loops

ADA Requirements:

The city must provide auxiliary aids and services when required to ensure effective communication or access to its programs and services. Assistive listening systems can provide increased audio access for people with a wide range of hearing impairments.

Self-Evaluation:

The City of Bellevue has installed state-of-the-art hearing loop systems in City Hall for the Council Chambers and Council Study Room and in the Bellevue Youth Theatre. These systems provide greater clarity of sound and increased amplification to enable people with hearing loss to hear and participate in events in these locations. A hearing loop is a permanently installed wire in the flooring or walls that broadcasts a signal that can be picked up by any hearing aid or cochlear implant with a T-coil. A hearing loop is the most effective and easy-to-use system for the vast majority of individuals with hearing loss, as it delivers sound directly to the ear through the user’s own hearing device optimized for his or her hearing loss.



4.3. SELF EVALUATION: Effective Communication

Receivers and headsets are also available so anyone can use the system to hear better without a hearing aid.

The same loop technology can be used at service counters and other locations with transient customers. Counter loops have been installed at the ticket windows and concession window at the Bellevue Youth Theatre to enable customers to more easily communicate with staff.

Hearing loop systems are common throughout Western Europe, particularly in Britain and Scandinavian countries where they are nearly universal in theatres, houses of worship, and ticket windows. The City of Bellevue worked closely with members of the local chapter of Hearing Loss Association of America and the advocacy group Let's Loop Seattle to design and test the systems. Several City Council members strongly supported an allocation of Capital Improvement Project funds to install the loops. The hearing loop systems were rolled out in April 2016 with a demonstration at a City Council meeting and a public reception at Bellevue Youth Theatre.



Public contact staff are now more aware of the assistive listening systems available for people attending City Hall and Bellevue Youth Theatre events. Staff at City Hall and Bellevue Youth Theatre have been trained and new signage has been prominently placed.

The hearing loop systems replaced old FM assistive listening systems that required users to check out a receiver and headset. Those systems are still in good working order and will be retrofitted to serve as portable systems for spaces that cannot be looped, such as the outdoor amphitheater at Bellevue Youth Theatre.

Future plans include:

- Retrofit existing portable microphone/podium with FM system removed from Council Chamber.
- Install hearing loop technology in the largest and most used space at five community centers.
- Purchase portable FM systems for City Hall (2 additional) and Parks sites (5)
- Purchase free standing service loops for customer service counters at various locations (at least 10)

Areas for Further Evaluation:

- ✓ Assess the level of staff training needed to effectively publicize and help event attendees use the assistive listening systems.

Recommendations:

- Gather public input to determine community priorities for additional spaces and locations for assistive listening technology.

4.3. SELF EVALUATION: Effective Communication

4.3.4 Interpreters and Captioning

ADA Requirements:

The city must provide auxiliary aids and services when necessary for effective communication, unless it can demonstrate that it causes an undue burden to do so. Primary consideration should be given to the preference of the individual requesting the accommodation, but the city does not have to provide the exact requested accommodation as long as it is effective. For example, providing sign language interpreters for a hearing-impaired person who does not sign is not effective.

Self-Evaluation:

While about half of city departments surveyed in 2007 indicated that they had formal or informal processes for providing auxiliary aids and services, the survey did not ask specifically about provision of sign language interpreters, captioning, and other types of communication services. Current observations indicate that most offices are aware that providing interpreters is an accommodation and will seek information on how to do so when requested. Most are not aware of the variety of other communication services such as Computer Assisted Real-time Transcription (CART) or other types of interpretation such as video remote interpreting, tactile interpreting for deaf-blind individuals or oral interpreting for those who lipread.

The city has developed resource guides with information about using and scheduling CART and sign language interpreting and a vendor list. These guides will be posted on the city intranet so they are available to all staff. The city recently launched a citywide contract with LanguageLine, a spoken-language interpretation service over the phone. Customer service staff can call and get an interpreter immediately when communicating with individuals who do not speak English well. Similar procedures and training will be used to roll out video remote interpreting for point-of-service accessibility.

The city has begun to provide communication access services upfront for major public events and has received positive feedback for doing so. At January 2016 events for Martin Luther King Day, CART was provided for public events at City Hall, the Bellevue Main Library, and Crossroads Mall. At each event, comments from participants indicated that the captioning increased comprehension for people with mild hearing impairments (many seniors) who would not have requested accommodation, those with learning disabilities, and English as a second language.

Areas for Further Evaluation:

- ✓ Assess what further information or training is needed to make all public contact staff aware of resources for interpreting, real-time captioning and other communication access services.

Recommendations:

- Provide training to public contact staff on choosing and using interpreting, real-time captioning and other communication access services.

4.4. SELF EVALUATION: Accessible meetings and events

- Evaluate equipment and telecommunications requirements for providing remote interpreting or CART at public meetings, and consider acquiring or installing additional equipment or services as needed to provide access in the most frequently-used spaces.
- Investigate whether establishing a centralized citywide contract with several service providers would reduce costs or improve effectiveness of providing communication access services.
- Include checkboxes or prompts about providing communication access in all internal forms and guidelines related to putting on public events or meetings.

4.4 ACCESSIBLE MEETINGS AND EVENTS

ADA Requirements:

When the city holds meetings or public events, they must be in an accessible facility and provide effective communication for people with disabilities. The event sponsor should include a notice that accommodations are available, with contact information and a date for requesting accommodations before the event. Materials distributed or shown should be accessible upon request: alternate formats for documents, captioning and/or audio description for videos, and interpretation or real-time captioning for speakers or presentations. Assistive listening systems should be available in all facilities and should be offered whenever amplification is used. Service animals must be permitted at meetings.

Self-Evaluation:

Nearly all public-facing departments indicated in 2007 that they sponsor public meetings or events; Finance, Human Resources, and the City Attorney's Office said they did not. Current observations indicate that publicity for some public events includes an accommodation notice, but that the language is not standardized. When requested, most departments will provide interpreters or other accommodations, but few staff consider proactively providing access services in the absence of a request. This is a reasonable approach to avoid unnecessary expense, but means that people with communication-related disabilities effectively cannot participate in open, unreserved drop-in events such as open houses, neighborhood forums or appearances by elected officials. Staff in many departments indicate a desire for guidance and resources on planning accessible meetings.

Areas for Further Evaluation:

- ✓ Gather data on the number, type, frequency and size of public meetings and events, and on the departments sponsoring them.
- ✓ Assess staff knowledge of planning accessible meetings to gauge the level of information and training needed.

Recommendations:

4.5. SELF EVALUATION: City Website and Online Services

- Provide guidelines for planning accessible meetings on the city intranet site, together with resource lists for interpreters, captioning, alternate formats, site selection criteria, etc.
- Provide staff training on accessible meetings.
- Integrate accessibility prompts or checklists into room reservation forms, sound equipment checkout procedures, and other routine documentation related to planning and staging events.
- Ensure that built-in and portable assistive listening systems are maintained in good working order and available for use anytime the facility is open.

4.5 CITY WEBSITE AND ONLINE SERVICES

ADA Requirements:

The city is required to make its website and online services equally accessible to people with disabilities, and to ensure that all features and services available through the website are accessible.

Self-Evaluation:

The City of Bellevue's current website has over 6000 pages as of January 2016 and receives thousands of hits per day; it is one of the major tools that the city uses to communicate with residents and deliver programs and services to the public. The city also maintains an intranet site for employee and contractor use.

The city launched a major website redesign project in 2015, and expects to go live with the new website in mid-2016, with rollout completed by the end of 2016. Experience with accessibility was one of the criteria used to select the vendor, CivicLive, and the ADA Coordinator is working closely with the vendor to ensure that the new website is fully accessible. The previous website redesign in 2006 incorporated accessible features in the design and in staff guidelines for content creation. It is compatible with most screen reader software used by blind people, and features an option that allows users to change font size to meet individual needs. Links are identified with the destination web page or file, and images and other graphics have alt-text labels. The link to the accessibility page is in the footer of all city web pages. However, many features such as video content, forms, or links to third-party applications used for city services may not be fully accessible.

The new City of Bellevue website will comply with the W3C World Wide Web Consortium Web Content Accessibility Guidelines 2.0, Level A and Level AA Success Criteria and other Conformance Requirements, commonly referred to as WCAG 2.0 AA.⁸ The applicable standard will be the version in effect at the time of launch. As the city develops content accessibility guidelines, it may choose to adopt some of the WCAG 2.0 Level AAA Success Criteria as well. Achieving some of the criteria such as providing captioning

⁸ The most current version is always available at <http://www.w3.org/TR/WCAG20/>.

4.5. SELF EVALUATION: City Website and Online Services

and audio description for every video, will require significant additional resources. Based on a cost and priority analysis, the city may adopt a phased approach to full implementation of these criteria.

The city has opted not to use the federal agency web accessibility standards in Section 508 of the Rehabilitation Act, which are very similar to WCAG 2.0. The Section 508 standards are currently undergoing revision by the US Access Board and the Federal Communications Commission and will be merged with the telecommunications accessibility standards in Section 255 of the Telecommunications Act. Once those new standards are released, the city should evaluate whether to adopt them for all its electronic and information technology products and services.

On the new website, online services and interactive forms, such as permit applications, utility payments, and park activity reservations, will receive extra attention and user testing to ensure that they are easy for people with a variety of disabilities to find and use. There are a number of other websites or linked services that the city uses, such as MyParksandRecreation.com for reservations, and the Granicus website for viewing City Council documents and videos. These will each be evaluated and accessibility problems corrected to the extent possible. Where access problems lie within a contractor or service provider's website or application, the city will work with the vendor to correct the problems and ensure that the next version is fully accessible.

The City of Bellevue is also expanding its multi-lingual web pages and will ensure that all features are accessible in all languages. For example, a video in Chinese would include captions in Chinese. For all content, plain language guidelines will be applied with an eye toward making the website easier to navigate for people with intellectual disabilities and/or limited English proficiency.

The ADA Coordinator is a member of the team developing website policy and governance, and continues to bring accessibility issues to the fore. Content guidelines and style templates will include information about accessibility requirements, especially for audiovisual or dynamic content. Where possible, the content management system will prompt users to review accessibility before posting new content. Training on the maintenance and use of the new website will include information on accessibility requirements and resources available to staff who manage the web pages for each department.

Areas for Further Evaluation:

- ✓ Bellevue participates in an eGov consortium with other cities and uses NeoGov for job postings and applications. NeoGov is reportedly inaccessible to blind people using common screenreaders. They cannot complete and submit applications through the system, and there is no accessibility notice in the user interface. Investigate further to learn more about access issues and prior attempts by other cities/counties to resolve problems.
- ✓ CivicLive's Content Management System (CMS), the interface that city employees will use to update and manage the website, does not meet the W3C Authoring Tool Accessibility Guidelines

4.5. SELF EVALUATION: City Website and Online Services

(ATAG 2.0)⁹ which could present a barrier for employees with disabilities. Evaluate the specific barriers and identify possible work-arounds and plans to improve access.

Recommendations:

- Continue to incorporate diversity and accessibility recommendations into content management guidelines and website governance policies as they are developed and implemented.
- Post web accessibility information in the “Accessibility” link on the footer of all city webpages. A statement of conformance with WCAG 2.0 is optional, but if the claim is made or if the WCAG logo is used, ensure that all requirements of a conformance claim are met. Generally this is a statement of the date, version, conformance level, and technologies used to determine conformance.
- Work with CivicLive to make the next version of its CMS compliant with ATAG 2.0 or current version.
- Develop policies and procedures to work with vendors of linked sites that provide city services to correct accessibility problems and ensure that future versions are fully accessible.
- Work with other cities in eGov consortium to ensure that NeoGov website used for job postings and applications is fully accessible to blind people.
- Include specific accessibility requirements in IT contracts and procurement criteria.
- Determine best practices on other city websites that incorporate captions and audio description into all videos. Develop budgeting and policy plan for increasing the access of all city videos on the website.
- Designate a web accessibility coordinator within the IT department, as this is a best practice recommended by the DOJ when auditing cities for ADA compliance.
- Evaluate whether to adopt as city policy the new Section 508 electronic and information technology accessibility standards, when issued.

4.5.1 Online transactions

ADA Requirements:

Online forms, transactions and interactive systems must be equally accessible to people with disabilities and must not pose barriers to those using screen readers or assistive technology. Where barriers exist, they must be mitigated by providing access to the relevant programs, services or activities by other means, but this should be a temporary measure while barriers are being removed.

Self-Evaluation:

Most online interactions with the public take place on the City of Bellevue website. The website is undergoing a complete redesign in 2016 and will comply with the W3C World Wide Web Consortium Web Content Accessibility Guidelines 2.0, Level A and Level AA Success Criteria and other Conformance

⁹ The most current version is always available at <http://www.w3.org/TR/ATAG20/>

4.6. SELF EVALUATION: Bellevue TV

Requirements, commonly referred to as WCAG 2.0 AA.¹⁰ The current version of the website is substantially compliant with the standards. It is unknown whether there are any significant accessibility issues with the current forms, interactive portals, bill payment systems, registration and document retrieval systems that the City of Bellevue uses to fulfil various customer-service functions on its website. Many of these use third-party software or systems that may not have been rigorously tested against accessibility standards.

The NeoGov system used for job applications reportedly has some accessibility barriers for blind people; job applications cannot be completed and submitted using a screen reader. Approximately 1,500 state and local governments use NeoGov, including many in the Puget Sound area, so this is a serious issue that should be investigated further.

Areas for Further Evaluation:

- ✓ Evaluate the accessibility of NeoGov and determine what can be done to improve accessibility and to provide an immediate workaround if access problems cannot be corrected quickly.
- ✓ Conduct a thorough accessibility review of all customer-service and third-party systems and applications used or linked through the City of Bellevue website, or used to conduct city business. Identify barriers and take the opportunity to correct them during the website redesign process.
- ✓ Identify programmatic means of providing access for any identified technology barriers, and ensure that potential customers/residents with disabilities are informed of these means.

Recommendations:

- Develop a robust accessibility review and testing process to be used as a standard part of software development and acquisition. The process should include live user-interface testing by individuals or companies with expertise in assistive technology and access issues, rather than relying solely on automated testing methods.
- Consider using or formally adopting the next version of electronic and information technology accessibility standards in Section 508 of the Rehabilitation Act to guide purchasing decisions. The standards are being updated and a new version will be released in late 2016 or 2017.

4.6 BELLEVUE TV

ADA Requirements:

The city is required to ensure that all programs, services, and activities are accessible when viewed in their entirety. Generally, access to video programming requires providing captioning and audio description.

¹⁰ The most current version is always available at <http://www.w3.org/TR/WCAG20/>.

4.6. SELF EVALUATION: Bellevue TV

The Web Content Accessibility Guidelines (WCAG 2.0) are not ADA standards but it is recommended that state and local governments meet Conformance Level AA to comply with the program access requirements of the ADA. Some state and local governments also meet portions of Level AAA. Captioning and audio description requirements for the three conformance levels are summarized in the table below.

Web Content Accessibility Guidelines (WCAG 2.0) Conformance levels			
Time-based media type	Level A	Level AA	Level AAA
Pre-recorded audio-only (podcasts)	A and AA: Alternative such as transcript		Alternative such as transcript Background sound absent, user-selectable, or 20 dB lower than foreground speech (not applicable to music or singing)
Pre-recorded video-only (animations or video clips)	A and AA: Alternative presenting equivalent content such as audio track or text file for animated video		Alternative to time-based-media such as content presented by other means
Prerecorded audiovisual (videos, stored webinars)	Captions Audio description or alternative	Captions Audio description	Captions Extended audio description Sign language interpretation Alternative to time-based-media such as content presented by other means
Live audio-only (live podcast or audio feed)	N/A	N/A	Captions or alternative
Live audiovisual (broadcast or streaming meetings, live events, or webinars)	N/A	AA and AAA: Captions	

Self-Evaluation:

Bellevue Television (BTV) was established in 1994 to provide residents of Bellevue, Washington with quality local government programming. BTV provides twenty-four (24) hour, seven (7) day-a-week programming for Bellevue residents, including gavel-to-gavel coverage of City Council meetings, providing access and open transparency of government operations for residents. BTV airs programming that provides information to the community about their municipal government, including information about important programs, services and opportunities provided by the City of Bellevue. BTV Channel 21 is a Public, Educational, Government (P.E.G.) Access Channel as provided for under the Cable

4.6. SELF EVALUATION: Bellevue TV

Communications Act of 1984, Section 531, and the cable franchise agreements with licensed franchise serving Bellevue, WA. Through the Comcast franchise, the channel is carried on the basic tier and reaches every City of Bellevue subscriber in the local cable system. In addition, BTV content is streamed online from the city's website and BTV video content is available on the City of Bellevue YouTube channel.

Most programming is pre-recorded, but all council meetings are broadcast live, and are then replayed on the channel. BTV also regularly airs mostly pre-recorded public meetings of interest to Bellevue residents that are provided by the State, King County and Sound Transit.

Bellevue TV does not currently provide captioning or audio description on most of its programming. In addition to the cost of the captioning services (\$2.50 – \$3 a minute from the current vendor), there are other resource and technical constraints. For pre-recorded video, there are staff time requirements necessary to integrate the transcription into the video. To integrate live transcription into video, there are additional software and hardware requirements as well. Bellevue TV is operated through a partnership with Bellevue College, which houses a state-of-the-art studio and offers student crews for additional support.

Areas for Further Evaluation:

- ✓ Determine what, if any, programming has been captioned or audio described, and how BTV has responded to access requests.
- ✓ Find out if video programming from other sources may be available with captions upon request, especially video from other government entities.
- ✓ Assess the ability to turn on YouTube's automatic caption generation function in all BTV programming presented online.

Recommendations:

- Determine best practices in other cities and gather information on cost and technology requirements.
- Seek input from the disability community to determine priorities for what types of programming get captioned or audio-described first.
- Develop guidelines on the use of automatic caption generation software vs more accurate but costly human-generated captions for different types of video programming.
- Develop a timeline to ramp up the quantity of captioning and audio description available, and develop budget proposals for funding.
- Consider collaborating with Bellevue College, which has previously considered creating a court reporter training program. Encourage re-consideration of this program or leveraging other resources to provide low-cost options for captioning, transcribing and audio-describing BTV content.

4.7. SELF EVALUATION: Governance: City Council, Boards and Commissions

4.7 GOVERNANCE: CITY COUNCIL, BOARDS AND COMMISSIONS

ADA Requirements:

Bellevue's commitment to being an inclusive and welcoming community fits well with the ADA requirements of providing equal access to city governance so that people with disabilities can be informed, engaged participants in civic life. The city must reasonably modify its policies, practices and procedures to provide access to all programs, services, activities and benefits of governance. Effective communication must be provided for meetings and interactions with the public, and eligibility requirements and criteria must not have the effect of excluding people with disabilities.

Self-Evaluation:

City Council

The work of Bellevue's elected City Council sets the vision and tone for the city, and the Council members make policy and fiscal decisions that have tremendous impact on residents of Bellevue and the region. Full participation in civic life requires that the workings of government be transparent and accessible to all. Members of the public interact with the City Council's formal activities by attending Council and subcommittee meetings, providing oral or written communication, reading Council materials such as agendas or the content of the Council packets (memos, background information, budgets, contracts, policy information), or watching the City Council meetings on Bellevue TV or online. Council members frequently interact with the public at community events, meetings and celebrations.

Boards and Commissions

The City Council appoints residents to boards, commissions and committees that provide detailed study and recommendations on important policy matters. Without the assistance of these dedicated groups, the part-time Council could give many complex and significant matters only limited review. Other volunteer panels focus on specific interests important to residents. The meetings and activities of these twelve advisory bodies are part of Bellevue's formal governance and are subject to the same legal and ethical requirements as City Council activities. This includes ADA requirements for access and accommodation as well as requirements on open public meetings, record-keeping, voting and attendance.

There are two major accessibility issues: access to the proceedings and work of the city's governing bodies, and access to serving and participating in city government.

Access to Proceedings

The city does a good job of providing access to meetings and deliberations, as staff generally respond promptly and appropriately to requests for communication access such as interpreters or captioning, and assistive listening systems are available in the Council chambers and study room. Agendas and other materials are generally available in accessible electronic formats. All Council meetings and many board and commission meetings can be viewed live online or on Bellevue TV and are then re-broadcast and available on streaming video. All Council members and most board and commission members have or will soon receive cultural competency training, which includes a section on disability awareness.

There are access challenges because there is a great deal of variability between different boards and commissions about when meetings are held, how far in advance they are scheduled, when materials or

4.7. SELF EVALUATION: Governance: City Council, Boards and Commissions

agendas are available for review, and the level of detail in the minutes or other records. There is also variability in the language used to notify the public that accommodations are available, and in the timelines for requesting accommodations. In some cases, City Council meeting notices state that accommodation requests must be made one week before the meeting date, but the documents with these instructions are not released until four days before the meeting – after the deadline for requesting accommodations. Simply delaying the timeframe for requests will not solve the problem, as some accommodations such as ASL interpreters require advance scheduling and are likely not to be available on short notice. Videos of Council or commission meetings are not accessible to hearing and visually impaired individuals, as there is no captioning and no audio description to note who is speaking or to convey information on slides or visual aids presented at the meeting.

Access to Service and Participation

Part of Bellevue’s commitment to diversity is a commitment to increase representation within city government. While there are no eligibility criteria for appointed or elected office that appear to explicitly or implicitly screen out individuals with disabilities, historic underrepresentation persists and is not easily changed. The Bellevue Essentials program, a leadership development program organized by the Neighborhood Outreach division of the Planning and Community Development department, serves as an onramp to civic participation. A group of 35 residents attend a nine-week course with presentations from every city department and many community organizations, and an in-depth introduction to how city government functions and relates to the community. The city has actively recruited a more diverse group, including people with disabilities, and has seen several graduates each year go on to city appointments, elected office, and other community leadership positions.

Areas for Further Evaluation:

- ✓ Review the policies and practices of all boards and commissions to understand the reasons for variations in meeting styles and schedules and better assess the impact it has on public engagement. Determine if the impact on people with disabilities is disproportionate.
- ✓ Gather data on past accessibility and accommodation requests for city governance meetings and materials.

Recommendations:

- Standardize the meeting notice and accommodation request language among all Bellevue governing bodies, and ensure that staff have access to resources to speed up the provision of accommodations.
- Continue to recruit people with disabilities for Bellevue Essentials.
- Provide training to Council, board and commission members on ADA requirements for city governments.

4.8. SELF EVALUATION: City laws, regulations and policies

- Include governance activities in other city access and compliance efforts, e.g., focus on access to Council meetings when planning how to increase communication access or captioning.

4.8 CITY LAWS, REGULATIONS AND POLICIES

ADA Requirements:

The city is required to review all its laws, regulations and policies to prevent discrimination on the basis of disability. The ADA requires the city to make reasonable modifications to these laws, regulations and policies if they intentionally or unintentionally discriminate against or adversely affect people with disabilities.

Self-Evaluation:

The major laws, regulations and policies governing the City of Bellevue are its City Code, including development and land use codes, the Comprehensive Plan, and a complex set of contracting and procurement laws and policies. The City Code and the Comprehensive Plan were reviewed to identify and assess the impact of laws and policies relevant to the ADA. Contracting and procurement policies were identified for further evaluation.

4.8.1 Bellevue Municipal Codes

There is no one centralized place for ADA requirements under the City Code. Code sections regarding ADA are located in various areas of the code depending on the subject matter. For instance, in the section 14.60.181 of the Transportation code, ADA is addressed with respect to frontage improvement. In the Fair Housing section of the code, there are restrictions on discrimination in housing. Section 20.30T of the Land Use code provides exceptions to the Land Use code based on ADA issues. A review of every section of the code has been undertaken. Language in the code, except in a few areas, does not clearly identify ADA policies. A closer examination of adopting a centralized ADA section of the city code will be undertaken in order to more readily locate ADA requirements. Furthermore, this examination will determine whether it is appropriate or beneficial to have more concrete ADA language in the code. In order to accomplish the task, an ADA code task force consisting of various departments will be created. The responsibility of the task force will be to closely examine each section of the City code to determine what improvements are necessary and consistent with the current state of the ADA.

The City of Bellevue officially adopted the 2012 edition of the International Building Code (IBC) as its building code in June 2013, following the State of Washington which adopted it in 2004.¹¹The IBC includes provisions ensuring that public facilities are accessible to and usable by person with disabilities. In late 2016, the Council will consider adopting the 2015 edition of the IBC

The following are some Bellevue Code provisions related to ADA:

4.28.170 – Equal Opportunity Requirements for Contractual Service Providers

¹¹ RCW 19.27 and 70.92

4.8. SELF EVALUATION: City laws, regulations and policies

A contractor “...shall provide a written statement to all new employees and subcontractors indicating commitment as an equal opportunity employer and the steps taken to ensure equal treatment of all persons.”

Land Use CODE Part 20.30T Reasonable Accommodation

Any person claiming to have a handicap or disability, or someone acting on his or her behalf, who wishes to be excused from an otherwise applicable requirement of this Land Use Code under the Fair Housing Amendments Act of 1988, 42 USC 3604(f)(3)(b), or the Washington Law Against Discrimination, Chapter 49.60 RCW, must provide the Director of the Development Services Department with verifiable documentation of handicap or disability eligibility and need for accommodation. The Director shall act promptly on the request for accommodation. If handicap or disability eligibility and need for accommodation are demonstrated, the Director shall approve an accommodation which may include granting an exception to the provisions of this Code. The Director shall not charge any fee for responding to such a request. The Director’s decision shall constitute final action by the City on the request for accommodation, and review of that decision will be available only in court. An action seeking such review must be filed not more than 21 days after the Director’s decision. (Ord. [6197](#), 11-17-14, § 25; Ord. [5001](#), 7-7-97, § 5)

Fair Housing 9.20.010 Declaration of policy.

Recognizing that discrimination in housing adversely and seriously affects the public health, safety and welfare, and in the belief that all persons regardless of race, color, religion, ancestry, national origin, sex, sexual orientation, gender identity, disability, familial status, marital status, veteran/military status, or Section 8 status (see BCC [9.20.045](#)) should be assured an equal opportunity to acquire, use and possess housing facilities within the city, the ordinance codified in this chapter is enacted, and certain practices described as unfair housing practices are prohibited as an exercise of the city’s police power and in furtherance and for the protection of the public health, safety and welfare.

9.20.040 Unfair housing practices designated.

- A. No owner, lessee, sublessee, assignee, real estate broker, real estate salesman, managing agent of a housing accommodation or other person having the right to sell, rent, lease, sublease, assign, transfer or otherwise dispose of a housing accommodation shall refuse to sell, rent, lease, sublease, assign, transfer or otherwise deny to or withhold from any person or group of persons such housing accommodations, or segregate the use thereof, or represent that such housing accommodations are not available for inspection, when in fact they are so available, or expel or evict an occupant from a housing accommodation because of race, color, religion, ancestry, national origin, sex, sexual orientation, gender identity, disability, familial status, marital status, veteran/military status, or Section 8 status of such person or persons or discriminate against or segregate any person because of race, color, religion, ancestry, national origin, sex, sexual orientation, gender identity, disability, familial status, or marital status of such person, in the terms, conditions or privileges of the sale, rental, lease, sublease, assignment, transfer or other disposition of any such housing accommodations or in the furnishing of facilities or services in connection therewith.
- B. A real estate broker, agent, salesman or employee shall not, because of race, color, religion, ancestry, national origin, sex, sexual orientation, gender identity, disability, familial status, marital status, veteran/military status, or Section 8 status of an occupant, purchaser, prospective occupant or prospective purchaser:

4.8. SELF EVALUATION: City laws, regulations and policies

1. Refuse, or intentionally fail to list, or discriminate in listing a housing accommodation for sale, rent, lease or sublease;
 2. Refuse or intentionally fail to show to a prospective occupant the housing accommodation listed for sale, rental, lease or sublease;
 3. Refuse or intentionally fail to accept and/or transmit to an owner any reasonable offer to purchase, lease, rent or sublease a housing accommodation;
 4. Otherwise discriminate against an occupant, prospective occupant, purchaser or prospective purchaser of a housing accommodation.
- C. No person, bank, banking organization, mortgage company, insurance company or other financial institution or lender, or any agent or employee thereof, to whom application is made for financial assistance for the purchase, lease, acquisition, construction, rehabilitation, repair or maintenance of any housing accommodation shall:
1. Discriminate against any person or group of persons because of race, color, religion, ancestry, national origin, sex, sexual orientation, gender identity, disability, familial status, marital status, veteran/military status, or Section 8 status, or such person or group of persons or of the prospective occupants or tenants of such real property in the granting, withholding, extending, modifying or renewing, or in the rates, terms, conditions or privileges of, any such financial assistance or in the extension of services in connection therewith; or
 2. Use any form of application for such financial assistance, or make any record of inquiry in connection with applications for such financial assistance which expresses, directly or indirectly, any limitation, specification or discrimination on the ground of race, color, religion, ancestry, national origin, sex, sexual orientation, gender identity, disability, familial status, marital status, veteran/military status, or Section 8 status.
- D. An owner, person, real estate broker, agent, salesman, employee or lender shall not:
1. Require any information, make, or keep any record, or use any form of application containing questions or entries concerning race, color, religion, ancestry, national origin, sex, sexual orientation, gender identity, disability, familial status, marital status, veteran/military status, or Section 8 status in connection with the sale, rental, lease or sublease of any housing accommodation;
 2. Publish, circulate, issue or display, or cause to be published, circulated, issued or displayed, any communication, notice, advertisement or sign of any kind relating to the sale, rental, lease, sublease, assignment, transfer or listing of a housing accommodation or accommodations which indicates any preference, limitation, specification or discrimination based on race, color, religion, ancestry, national origin, sex, sexual orientation, gender identity, disability, familial status, marital status, veteran/military status, or Section 8 status;
 3. Aid, abet, compel or coerce the doing of any act defined in this chapter as an unfair housing practice; or obstruct or discriminate against a person in any manner because he has complied or proposed to comply with the provisions of this chapter or has filed a complaint, testified or assisted in any proceeding under this chapter, or any order issued thereunder, or attempt, either directly or indirectly, to commit any act defined in this chapter to be an unfair housing practice or apply any economic sanctions or deny any membership privileges because of compliance with the provisions of this chapter.
- E. For purposes of discrimination based on handicap, discrimination includes:
1. A refusal to permit, at the expense of the handicapped person, reasonable modifications of existing premises occupied or to be occupied by such person if such modifications

4.8. SELF EVALUATION: City laws, regulations and policies

may be necessary to afford such person full enjoyment of the premises except that, in the case of a rental the landlord may where it is reasonable to do so condition permission for a modification on the renter agreeing to restore the interior of the premises to the condition that existed before the modification, reasonable wear and tear excepted;

2. A refusal to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford such person equal opportunity to use and enjoy a dwelling; or
- F. Nothing in this subsection E requires that a dwelling be made available to an individual whose tenancy would constitute a direct threat to the health or safety of other individuals or whose tenancy would result in substantial physical damage to the property of others. (Ord. [6195](#) § 3, 2014; Ord. [4148](#) § 3, 1990; Ord. [4061](#) § 3, 1989; Ord. [3550](#) § 5, 1985; Ord. [3516](#) § 28, 1985; Ord. 2398 § 5, 1977; 1961 code § 7.60.040.)

Employment and Human Resources Policies: 3.79.080 Employment and work place policies.

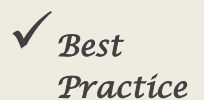
A. Equal Employment Opportunity. The city has a policy of providing a work environment free from unlawful discrimination and harassment. The city will take appropriate steps so that employees have such a discrimination-free and harassment-free work environment, including appropriately disciplining, up to and including termination from employment, for employees who are found to have violated this policy. The city manager shall develop a complaint procedure for reporting unlawful discrimination and harassment that requires employees to utilize the complaint procedure where they believe that they are being subjected to unlawful discrimination or harassment in the work place.

Transportation Development Code: 14.60.181 – Americans with Disabilities Act

All street frontage improvements and non-motorized facilities shall be designed and constructed to meet the intent of applicable requirements of the Americans with Disabilities Act (ADA). In accordance with the state law and federal guidelines established by the ADA, wheelchair curb ramps shall be provided at all pedestrian crossings with curbs.

4.8.2 Comprehensive Plan

The City of Bellevue’s Comprehensive Plan is the city’s foundational policy document that guides growth and development for the next twenty years. The vision and detailed policy recommendations expressed in the plan set the priorities and parameters for much of what the city government does. These policies also guide the development and revision of the municipal codes, including development and land use codes. The biennial budget process uses Comprehensive Plan goals to evaluate budget requests and decide overall allocation priorities. Bellevue updated its Comprehensive Plan in 2015 as part of its compliance with Washington State’s Growth Management Act¹² and affirmed the city’s commitment to diversity, sustainable development, and open government.



¹² Chapter 36.70A RCW.

4.8. SELF EVALUATION: City laws, regulations and policies

These commitments translate into greater focus on diversity and inclusion in the plan’s detailed policy goals. Disability and access issues are specifically mentioned in 21 policy items in eight subject areas in the current plan; the 2010 plan contained only five disability-related items, mostly in human services. This is evidence of thoughtful and thorough integration of accessibility issues in high-level policies and provides a strong foundation for implementation at all levels.

The following table lists Comprehensive Plan policies related to ADA implementation and providing access for individuals with disabilities:

CE-11	Commit to engaging citizens on significant civic issues in a manner that equitably reaches all of Bellevue’s population and that is inclusive of people of diverse backgrounds, languages and abilities. Recognize that engaging some population groups may require alternative outreach methods and personal contact.
CE-12	Provide equitable access to the city’s programs, services and events – including accommodation for disabilities, and populations with limited English language ability.
HO-19	Support housing options, programs, and services that allow seniors to stay in their homes or neighborhood. Promote awareness of Universal Design improvements that increase household accessibility.
HO-33	Recognize that adult family homes and other state regulated special needs housing provide stable, neighborhood housing options for elderly and disabled residents. Work to address needs for services, emergency response and other potential accommodations.
HO-34	Provide reasonable accommodation for housing for people with special needs in all areas, and avoid concentrations of such housing, while protecting residential neighborhoods from adverse impacts.
HO-37	Support and plan for assisted housing using federal or state aid and private resources.
TR-27	Design, implement and maintain transportation system improvement and deliver transportation services and programs in accordance with the Americans with Disabilities Act (ADA).
TR-76	Develop and maintain safe and convenient pedestrian access to transit stops and station, through shared responsibility with transit providers, that: <ol style="list-style-type: none">1. Provides short, direct routes within a ten-minute walk;2. Designs the pedestrian environment to be usable by all people, to the greatest extent possible, without adaptation;3. Maximizes safety for pedestrians at street crossings; and4. Gives priority to pedestrian access and safety.
TR-78	Develop and implement, in conjunction with the transit providers, an integrated way-finding system to facilitate transit ridership that incorporates principles of universal design and uses multiple languages.

4.8. SELF EVALUATION: City laws, regulations and policies

ED-18	Promote opportunities for self-sufficiency for all Bellevue residents by encouraging employers to hire people with special needs and disabilities.
HS-9	Improve access to services throughout the community by removing physical and systemic barriers and empowering individuals to overcome other barriers that may exist.
HS-10	Use City regulatory powers to protect individuals' rights and advance community health and human service objectives.
HS-11	Encourage culturally competent service delivery that respects the dignity of individuals and families, and fosters self-determination and self-sufficiency.
PA-15	Encourage the development of facilities for special purpose recreation.
PA-18	Provide a variety of services and programs accessible to all throughout the city with special emphasis on serving those with limited opportunities including low-income households, youth, individuals with disabilities and older adults.
PA-34	Evaluate existing parks and facilities, and renovate, where appropriate, to maximize efficient maintenance and operating practices, improve safety and accessibility for all users, and to reduce, where feasible, the impacts on adjacent properties.
SH-23	Emphasize public access [to shoreline] with foot, bicycle, and handicap paths to and along the water's edge. <i>From 2010 Shoreline Plan; 2015 update pending.</i>
UD-12	Enhance and support a safe, active, connected and functional pedestrian environment for all ages and abilities.
UD-35	Include clearly visible and accessible walkways from street sidewalks and parking areas to building entrances and within and between developments as part of site design.
UD-66	Ensure that sidewalks, walkways, and trails are furnished, where needed and appropriate, with lighting, seating, landscaping, street trees, planter strips, trash receptacles, public art, bike racks, railing, handicap access, newspaper boxes, etc. without interfering with pedestrian circulation.
UD-78	Design and coordinate the proximity of bike racks, wheelchair access, pedestrian amenities, non-motorized trails and other modes of transportation with transit facilities.

Encouraging density and transit-oriented development tends to increase pedestrian accessibility in general, because it decreases the distances that people must travel between their homes, jobs, shopping & recreation, and public transit. Because new construction must meet ADA codes, the development of significant new mixed-use centers in Factoria, Eastgate, Wilburton, Crossroads, and the Bel-Red Spring District well as increased development in downtown and integration with light rail, has the potential to dramatically improve Bellevue's overall livability and accessibility. Designing for people of all ages and abilities is listed as a key goal and success criteria in the Comprehensive Plan's Urban Design element.

Areas for Further Evaluation:

4.8. SELF EVALUATION: City laws, regulations and policies

- ✓ Identify other areas within planning and code development process with ADA impacts.

Recommendations:

- The ADA Coordinator should work with the city’s Planning and Community Development, Parks and Community Services, Transportation and Development Services Departments as well as with the Planning Commission to identify additional methods of integrating accessibility and Universal Design principles into the Comprehensive Plan and land use planning and development regulations. Some examples include:
 - Code requirements or incentives for developers to provide additional accessible housing units, including affordable accessible units.
- In next Comprehensive Plan update, propose the following new or revised policies:
 - High Capacity Transit (light rail and buses): Work with transit providers and other regional partners to optimize accessibility of the transit system for people with disabilities. A recommendation like this places access on par with other designated goals such as promoting ease of pedestrian access, landscaping and design objectives, etc.
 - Paratransit: Recommend that the Comprehensive Plan Transportation element not remain silent on ADA paratransit services. A possible goal would be that the city partner with regional transportation providers to ensure that paratransit services for people with disabilities are designed and operated in a manner that best meets the needs of the community, and that excessive delays, fees and restrictions are not imposed on riders. New federal ADA guidance¹³ on transit access and paratransit should be applied to the city’s evaluation of transit services and partnerships with transit agencies to promote full compliance.
 - Business Climate: Educate and support businesses on the requirements and benefits of making their businesses and services fully accessible to customers with disabilities. Communicate this as one of the city’s priorities and highlight the availability of resources to support this goal.
 - Ensure that policies to minimize the amount of impervious surfaces do not have the unintended effect of reducing accessibility in areas where land users have discretion to build paved vs. unpaved pathways. Examples: EN-43, UD-38, UD-64
 - In support of Goal PA-3: “Equitably distribute a variety of parks, community centers and other indoor and outdoor recreation facilities throughout the city,” the city should

¹³ US Department of Transportation, Federal Transit Administration Circular 4710.1: Americans with Disabilities Act (ADA) Guidance, November 4, 2015.

4.8. SELF EVALUATION: City laws, regulations and policies

factor in the distribution of accessible features of parks and natural areas throughout the city to ensure equitable opportunities for people with disabilities.

- Expand goals related to signage and wayfinding so that they specifically include wayfinding for accessible paths of travel. Examples: PA-17 and UD-53

4.8.3 Contracting and Procurement

ADA Requirements:

The city must ensure that its contractors do not discriminate on the basis of disability when providing city services, and must comply with a variety of federal, state and local contracting and procurement laws that contain equal opportunity and ADA-related requirements.

Self-Evaluation:

The City of Bellevue is subject to a complex and interlocking set of legal and procedural requirements dictated by Washington State Law (RCW) and Administrative Code (WAC), as well as Federal Highway Administration and Washington State Department of Transportation (WASHDOT) contracting requirements related to transportation and Capital Improvement Project grant funding. Most of these have equity, nondiscrimination, and equal employment clauses that relate to ADA compliance. The city has contracts with several state agencies and with supported employment services, which have associated regulations and codes. In addition, the city has its own procurement and contracting policies and procedures.

Areas for Further Evaluation:

- ✓ A comprehensive and thorough review of all the laws and regulations related to contracting and procurement is necessary to identify areas with access and ADA impact.

Recommendations:

Establish a contracts and procurements task force to closely examine all city policies and procedures as well as federal and state requirements to identify ADA-related provisions and areas for improvement or better compliance.

4.8.4 Licensing and Permitting

ADA Requirements:

The city must ensure that its licensing and permitting procedures are accessible and do not discriminate against individuals with disabilities or have the effect of doing so. Eligibility requirements must be directly related to the subject matter and not have the effect of excluding individuals on the basis of disability.

4.8. SELF EVALUATION: City laws, regulations and policies

Self-Evaluation:

The City of Bellevue issues licenses and permits for businesses, construction, occupancy, and a variety of other matters. The bulk of the city's permitting work is construction-related, with construction and building permits issued for residential, commercial and public right of way projects, and associated inspection and review activities required before projects are complete. The Development Services Department collaborates with the Fire, Transportation and Utilities Departments to manage the overall permitting, inspection and review processes.

Permitting and inspection play an important role in making the built environment in Bellevue more accessible, because permit applicants must demonstrate compliance with building codes and site design parameters that include ADA requirements. City code compliance officers, inspectors, and reviewers must be knowledgeable about the ADA as well as applicable fire, electrical, plumbing, and transportation codes and requirements. The city has a policy requiring pedestrian access during construction (see Appendix H) which includes instructions about providing a safe and accessible path of travel. The city also provides publications on construction and building code requirements, including a series of tip sheets that include information on ADA requirements for a number of building elements such as restrooms, door clearances and parking spaces.

Code compliance, inspection and permitting staff are often the first to hear about an access problem when a resident calls to complain, and have an excellent record of responding quickly and effectively. In many cases, staff are able to contact the property owner or contractor and have the matter resolved immediately when construction sites have blocked curb ramps, failed to provide adequate signage, or otherwise failed to provide accessible paths of travel.

Areas for Further Evaluation:

- ✓ Conduct a thorough review of the city's permitting, licensing, compliance, inspection and review activities to identify ADA-related aspects of these activities. Highlight best practices and identify areas where additional information or training would be helpful.
- ✓ Conduct a similar review of business and professional (non-construction) licensing and permitting activities to ensure that eligibility and qualification criteria do not have the effect of screening out individuals with disabilities.

Recommendations:

- Consult with Development Services staff to identify the most common access problems they encounter, in order to get a better understanding of areas where permit applicants or contractors could benefit from additional information on the ADA.

4.9 EMERGENCY MANAGEMENT

4.9.1 Internal Emergency and Evacuation Procedures

ADA Requirements:

The city must ensure that emergency and disaster plans, programs and services are accessible to people with disabilities. This requirement applies to city employees, city facilities and city programs open to the public.

Self-Evaluation:

The City of Bellevue plans for the safety and security of its own staff during emergencies and disasters. City employees are subject to regional hazards of earthquakes, landslides, windstorms and severe weather and the secondary hazards that may follow, such as power outages and disruption of transportation and infrastructure. Employees are also subject to localized and human-caused hazards such as building fires, hazardous materials spills, bomb threats or an active shooter.

All City Hall and Bellevue Service Center employees have periodic refreshers on emergency evacuation procedures and their department's designated assembly point outside each building. Each floor or office has several members of the Building Safety Team who will make sure everyone in their units is accounted for, using employee lists that note who may require assistance with evacuation, including those with disabilities. The list is periodically updated for correct locations, emergency contact numbers, and evacuation needs. As required by the ADA, all fire alarms have visual as well as audio alerts. Areas of refuge are located in the City Hall main central staircase, which is glass-enclosed so individuals needing assistance may be able to make visual contact with those outside the building. As required by the ADA in areas of refuge, there is also an emergency phone in the stairwell that directly connects to 911, allowing communication in an emergency.

All Parks employees have received emergency grab & go bags with essential supplies in case they need to remain onsite in an emergency. Each community center, park facility, and other city facility open to the public has emergency evacuation procedures clearly posted, and facility staff are responsible for evacuating employees as well as members of the public. The Parks & Community Services Department operates emergency shelters in designated park facilities. First responders assist staff with addressing the emergency, though they must also prioritize assessing and responding to overall community needs in large-scale disasters.

The 2007 employee survey did not ask about emergency procedures. Current findings indicate that some disaster coordinators are not aware of specific plans for evacuating disabled employees. Better education is needed and plans should be evaluated and updated as necessary.

Areas for Further Evaluation:

- ✓ Review what formal and informal procedures are in place to ensure appropriate assistance and prompt evacuation for disabled employees, especially during power outages when elevators are stopped.

4.9. SELF EVALUATION: Emergency Management

- ✓ Review public facility emergency plans to see if they have specific provisions for safely notifying and evacuating people with disabilities; whether staff are aware of these plans and appropriately trained and whether program participants and visitors with disabilities are notified effectively about the plans.

Recommendations:

- Develop guidelines for alerting and evacuating individuals with a variety of disabilities in various emergency situations and train all staff who participate in emergency management for city employees and facilities. Prominently posted placards or signage can contain information about disability evacuation procedures as well as general emergency information.
- Involve community members with disabilities in developing emergency plans for city facilities open to the public.
- Consider acquiring several evacuation chairs for City Hall, Bellevue Service Center, and other multi-level facilities to help with evacuating people with mobility impairments.
- Consider developing personal emergency egress plans for individual employees with disabilities, especially those whose functional impairments may not be known by or visible to co-workers.
- Consider partnering with disability organizations or tech businesses to explore the use of innovative technologies such as audible exit signs for orientation and direction, and vibrating paging systems.

4.9.2 Emergency preparedness: vulnerable populations

ADA Requirements:

Emergency preparedness and disaster response programs must be accessible to people with disabilities, and must include specific provisions to ensure the safety of people with disabilities and other vulnerable populations. Community members with disabilities should be involved in the planning process.

Self-Evaluation:

The City of Bellevue's 2013 Comprehensive Emergency Management Plan (CEMP) identifies three categories of vulnerable populations:

1. Adult care services (includes assisted living, eldercare, adaptive recreation and activity centers for people with disabilities, senior housing, and group housing for developmentally disabled),
2. Childcare services, and
3. Limited English Proficient individuals.

The Office of Emergency Management (OEM) has identified and mapped locations and facilities serving these populations, along with neighborhood demographics indicating languages spoken and potential poverty levels. These factors are integrated with hazard inventories and risk assessments for a variety of

4.9. SELF EVALUATION: Emergency Management

hazards such as earthquakes, landslides, tsunamis, severe weather, terrorist activity, and wildland-urban interface fires to develop an overall community response plan.

Several OEM Strategic Plan elements address the prevention, notification and response needs of vulnerable populations and incorporate them into community planning. These elements include:

- 7B. Develop and document program for engaging high risk and vulnerable populations before, during, and after event.
- 7C. Develop, maintain and test procedures for public information for high risk and vulnerable populations.
- 8B. Develop and maintain a plan to disseminate emergency alerts and warnings to vulnerable populations.

As part of developing the 2013 CEMP, OEM conducted a gap analysis based on past incident review, capability assessments and community stakeholder input, and came up with the following recommendations to address gaps related to serving vulnerable populations:

- Crisis Communications, Public Education and Information: Identify mechanisms and procedures for reaching vulnerable populations (before, during, and after event.)
- Hazard Identification, Risk ID and Consequence Analysis: Conduct a detailed vulnerability and consequence analysis to include a community profile
- Operational planning:
 - Identify vulnerable populations with assistance from experts and advocates
 - Determine size of those specific vulnerable populations
 - Planning Annex (supplemental information) should be created for vulnerable populations

The last item, creating a Planning Annex for vulnerable populations, is important because it elevates the issue to the same level as planning for other identified Emergency Support Functions like transportation, communication, search & rescue, hazmat response, and long-term recovery. This ensures that detailed plans for identifying and assisting individuals with disabilities will be integrated into operational and tactical plans, and that community stakeholders will have an active role in shaping those plans.

Several specific Emergency Support Functions (ESF) make reference to ADA requirements and disability access:

ESF 1 – Transportation

The Transportation Department has full responsibility in emergency transportation related issues, which includes the adjustment, maintenance, and coordination of transportation routes and street facilities affected by an emergency. Transportation infrastructure can affect the time it takes to evacuate. This, compounded with a population of disabled individuals, can impact safety. The plan requires mutual aid agreements with other agencies (such as Metro/King County Transit and Bellevue School District) for alternative means of transportation. These agreements will include physical access to specific vehicles (such as chair lifts on buses), mass evacuation pick-up sites, and procedures to evacuate the homebound.

4.9. SELF EVALUATION: Emergency Management

ESF 2 – Communications, Information Systems and Warning

This system provides information to the public via local radio and television stations. If there are no provisions to support both audio and visual alerts, then steps will be taken to create a program that supports such methods. Some examples would include TTY, open captioning, and/or sign language interpreters.

ESF 6 – Mass Care, Housing and Human Services

Steps will be taken for the Office of Emergency Management to coordinate with Parks & Community Services Department and other services in the area, such as the American Red Cross, Salvation Army, Washington Volunteer Organizations Active in Disasters, and local church/service groups. Steps should be taken prior to a disaster to ensure that shelters are:

- **Accessible.** Includes ensuring that parking, walkways, entrances, toilets, bathing facilities, drinking fountains, sleeping areas, food distribution and dining, first aid/medical units, emergency notification systems, and other activities are ADA compliant.
- **Have reasonable accommodations.** Includes modifications of "no pets" policies for service animals, kitchen access, and sleeping arrangements.
- **Adequate supplies for individuals with disabilities.** Includes provisions of medical equipment, refrigeration for medications, food options for those with dietary restrictions, electricity for medical equipment, and supplies for service animals.

The Office of Emergency Management will also partner with the Parks Department and local service providers to develop a disaster case management program to transition post disaster victims back into everyday life. This program will include application procedures that will not limit access to people with disabilities.

Bellevue OEM is taking steps currently to implement these goals and recommendations related to vulnerable populations. The number of staff with backgrounds in vulnerable population planning was increased in 2015, and OEM has begun to coordinate more community outreach efforts with other parts of the Fire and Police Departments. Bilingual staff have made presentations in Spanish to local church groups, and OEM is continuing to identify other avenues for reaching diverse and disabled members of the community.

NORCOM, the regional 911 response center hosted in Bellevue City Hall has been investigating the possibility of offering text messaging access to 911 calls. Several nearby jurisdictions are offering the service but there are concerns about system requirements, inability to track caller locations, and the difficulty of communicating effectively and responding appropriately to text calls.

Bellevue receives annual grants from the US Department of Homeland Security for the Urban Area Security Initiative (UASI) to address threats posed by terrorist actions as well as human and natural disasters. The UASI priorities include strengthening outreach, communication, and response for vulnerable populations. In previous years, OEM and other local fire departments have had volunteers from the Washington Service Corps, the state Americorps program, to work on UASI vulnerable

4.10. SELF EVALUATION: Public Safety and Law Enforcement

population projects. OEM and the Diversity Advantage Team have begun to investigate the possibility of doing so again for the 2016-17 internship year.

Areas for Further Evaluation:

- ✓ Evaluate feasibility of bringing on another Washington Service Corps volunteer to work on ADA, disability community outreach, and other vulnerable population issues.
- ✓ Assess first responders' knowledge and desire for training on effective communication with individuals with disabilities, particularly those with hearing impairments or autism spectrum disorders.

Recommendations:

- Partner with the Washington State Independent Living Council (SILC), which has a focus on emergency management for people with disabilities. The SILC conducted a series of emergency preparedness conferences across the state in 2015 with national and regional experts speaking with local fire and police departments.
- Continue to build relationships with disability community organizations to solicit input and engagement on emergency planning for Bellevue and the region.
- Research best practices on emergency planning for people with disabilities and consider adopting relevant and feasible elements of those plans.
- Continue to monitor Text-to-911 technical issues to determine if and when Bellevue can safely and effectively offer this service.

4.10 PUBLIC SAFETY AND LAW ENFORCEMENT

4.10.1 Police

ADA Requirements:

The ADA requires that city programs, services and activities be accessible to individuals with disabilities when viewed in their entirety, and requires reasonable modifications to policies, practices and procedures to achieve access. Communication with people with disabilities must be as effective as with others.

Self-Evaluation:

In 2006, the Police Department undertook a review of accessibility considerations in law enforcement, which resulted in the development and adoption of a policy to ensure effective communication with deaf and hard of hearing persons. It is in the Police Policy Manual, and is included as [Appendix I](#).

4.10. SELF EVALUATION: Public Safety and Law Enforcement

Areas for Further Evaluation:

- ✓ Evaluate current Police Department policies, practices and procedures with respect to the ADA and people with disabilities. Identify strengths, weaknesses, and resource needs.

Recommendations:

- Conduct a best-practices review of other municipal police departments, Department of Justice guidance on interacting with people with disabilities, and DOJ recent settlement agreements.
- Collaborate with Seattle and other local police departments to address the complex issues of mental health, substance abuse and homelessness and develop partnerships with mental health and disability organizations.

4.10.2 Courts and Probation

ADA Requirements:

The justice system must ensure full participation and equal access for individuals with disabilities in all programs, services and activities, and must ensure effective communication, including materials in alternate formats and/or providing auxiliary aids and services if needed. Interpreters or caption writers must have the appropriate certification and training for legal interpreting.

Self-Evaluation:

The King County District Court operates the Bellevue District Court under contract with the city, and provides all court-related services except probation. The city's Parks and Community Services Department operates probation services for adult misdemeanants. Bellevue Probation routinely interacts and coordinates directly with other parts of the justice system, including the Bellevue Police, Bellevue Prosecutor, King County District Court, and King County jail and/or regional jail providers, as well as with the Human Services network that provides intervention, prevention and victim services. The King County Court has its own ADA coordinator, so Bellevue residents going through the court system such as jurors, witnesses or defendants would request accommodations or access directly through the courts for programmatic accommodations such as assisted listening devices or interpreters. They would not go through the City of Bellevue. However under an agreement with King County, Bellevue provides the court building. As such, Bellevue is responsible for ADA accommodations with respect to the physical facility.

Probation services were included in the general departmental ADA survey in 2007, but there is no data specifically evaluating Probation and the unique issues the program faces in dealing with offender populations. Mental health issues are far more common among justice-involved individuals than among the general population, and are often complicated by substance abuse, making it challenging to clearly identify underlying disability issues and provide appropriate accommodations in a probation and corrections environment. Current observations indicate that Probation staff are aware of the ADA and

4.11. SELF EVALUATION: Adaptive Recreation: Choices for People with Disabilities

seek assistance when they believe a disability exists or when a misdemeanor requests accommodation. Staff have communicated with the Bellevue ADA Coordinator and with the King County Courts ADA Coordinator to consult on specific cases.

In 2015, the Bellevue District Court relocated into a city-owned building in the Bellefield Office Park near Mercer Slough. The building was substantially renovated to meet the needs of the court, but the site posed significant accessibility challenges. Because of the adjacent wetlands all buildings in that area are elevated above grade, and soil conditions do not allow installation of a wheelchair lift or elevator. Access to the court is via an extremely long exterior ramp which meets ADA standards and building code requirements, but nevertheless proves strenuous and difficult for people with mobility impairments to navigate.

Areas for Further Evaluation:

- ✓ Review Probation policies and procedures and re-survey staff to identify areas where additional information, training, or resources on the ADA would be helpful.
- ✓ Assess the new court facility and identify specific barriers and possible solutions.

Recommendations:

- Seek public input to further identify accessibility issues with the new court building.
- Collaborate with the Bellevue Police Department to investigate best practices on dealing with mental illness in law enforcement and courts, and identify possible strategies or improvements for Bellevue Probation.

4.11 ADAPTIVE RECREATION: CHOICES FOR PEOPLE WITH DISABILITIES

ADA Requirements:

The city must ensure that individuals with disabilities are not excluded from services, programs, and activities on the basis of disability, and must provide equal access to all programs. Physical barriers need not be removed if access can be provided through programmatic means such as moving events or activities to an accessible room or facility. The city is not required to take any action that would result in a fundamental alteration in the nature of the service, program or activity or in undue administrative and financial burdens. However, public entities must take any other action, if available, that would not result in a fundamental alteration or undue burdens but would ensure that individuals with disabilities receive the benefits or services.

Integration of individuals with disabilities into the mainstream of society is fundamental to the purposes of the Americans with Disabilities Act.

4.11. SELF EVALUATION: Adaptive Recreation: Choices for People with Disabilities

- Public Entities may not provide services or benefits to individuals with disabilities through programs that are separate or different, unless the separate programs are necessary to ensure that the benefits and services are equally effective.
- Even when separate programs are permitted, an individual with a disability still has the right to choose to participate in the regular program.
- State/local governments may not require an individual with a disability to accept a special accommodation or benefit if the individual chooses not to accept it.

Self-Evaluation:

It is the purpose of Bellevue's Parks & Community Services to provide people who live with disabilities a full range of opportunities and choices for recreation, socialization and learning so that they can participate more successfully in the life of our community. There is a strong emphasis on providing access to all programs, and many people with disabilities participate in general recreation activities; however there is also a need for specialized adaptive recreation programs that more fully meet the needs and preferences of some individual with disabilities. Bellevue's adaptive recreation program is widely recognized as one of the best in the nation, and serves as a resources for residents of the entire region, not just Bellevue residents.

✓ *Best Practice*

**** awards won??**

The City of Bellevue began providing specialized recreation activities for individuals with disabilities in the early 1970's with evening programs for adults with developmental disabilities. In the 1980's the city expanded services at Highland Community Center and established the Center as a "specialized recreation" facility providing services to residents with disabilities. During the 1990's the city broadened its program choices at Highland Center, expanded specialized recreation programs and activities to other city facilities and began to integrate specialized recreation participants into city recreation programs. During this time, participation in Highland Community Center programs increased significantly to include participants living outside of Bellevue. City staff worked to develop inter-local agreements with several neighboring cities. These agreements have supported reduction of the city subsidy for Specialized Recreation programs. Each year more and more individuals living with disabilities choose to participate in any program that the City of Bellevue offers. A descriptive list of adaptive recreation programs at Highland Center is included as [Appendix J](#).

**** include participant numbers? And breakdown by Bellevue residents vs neighboring cities, to demonstrate excellence in providing regional resource?**

In 2006, the city developed the Choices for People with Disabilities Plan to provide an outline of recreational choices available for residents with disabilities. It describes the process that Parks & Community Services uses to support the inclusion process & specialized recreation, thereby encouraging those living with disabilities to participate in the programs of their choosing. The Choices plan was drafted after reviewing the needs of Bellevue citizens and researching inclusion plans from across the United States. Development of the Choices Plan included a review of the City of Bellevue's legal responsibilities regarding access and accommodations, discussions with program participants regarding acceptable modifications as well as the review of inclusion models across the nation. The Plan was developed by a team of department staff and reviewed by managers and the Parks & Community

4.11. SELF EVALUATION: Adaptive Recreation: Choices for People with Disabilities

Services Board, and the first version was adopted in 2006. It was revised in 2007 and 2008 because the city had met all the program goals set forth in earlier versions. The 2008 Choices Plan is attached as Appendix K. ****replace with 2016 Choices Plan when update is complete**

The 2008 update of the Choices Plan includes the following goals to support the ongoing implementation of the plan:

1. Ensure that people with disabilities have access to City parks, facilities and programs.
2. Expand recreation “choice” opportunities.
3. Improve Parks & Community Services Staff knowledge and awareness toward serving residents with disabilities.
4. Develop and implement strategies that expand awareness and knowledge of program and service opportunities for residents with disabilities.

The City of Bellevue also offers adaptive and therapeutic swim programs at the Bellevue Aquatic Center, in both the regular pool and the warm-water therapeutic pool. Physical therapy programs and individualized aquatic therapy are provided by appointment, and the Warm Springs pool is also open members of the public. Water aerobics and exercise classes are geared towards specific groups; the Aquatic Center partners with the National Multiple Sclerosis Society and Special Olympics to offer classes and activities for members, as well as classes for those with arthritis, fibromyalgia or other back & joint issues.

The Choices Plan has been successful in guiding the inclusion process for people with disabilities participating in Bellevue’s park and recreation programs. It is widely distributed to participants, families, caregivers and staff in Bellevue and other neighboring cities. It is being updated in 2016 and will be more fully integrated with city ADA programs.

Areas for Further Evaluation:

- ✓ Complete the update of the Choices Plan, including gathering information from program managers and participants.
- ✓

Recommendations:

- Integrate future updates to the Choices Plan and adaptive recreation programs with public input on community priorities.
-

4.12 PUBLIC PROGRAMS

ADA Requirements:

The City of Bellevue’s programs, services, and activities offered to the public, when viewed in their entirety, must be readily accessible to and usable by individuals with disabilities. Programs must be offered in accessible facilities whenever possible, but access may be provided by modifying policies and practices.

Self-Evaluation:

The City of Bellevue conducted a survey of more than 100 managers in 2007 as a means of evaluating program accessibility throughout the city. The results, which are summarized in [Appendix L](#), revealed that city staff had a good general awareness of the ADA but were not universally aware of existing policies and procedures to ensure that individuals with disabilities receive consistent treatment throughout the city. Current observations and the beginnings of a systematic approach to re-evaluating program access on a citywide level bear out these results. A strong focus on customer service and collaboration means that staff follow through on the need to provide access but do not always have the resources to do so efficiently or to be proactive in building access into their programs.

The ADA Core Team recognizes the need for additional data and a deeper level of analysis to drive future recommendations. The team has begun to gather information about public programs in each department and to analyze the best methods of conducting a new survey. One approach being considered is to group program evaluations together by the type of public involvement rather than by department or division. For example, many public services are transactional in nature – permit applications, utility payments, park facility registrations – and can be evaluated with similar tools. Other public programs are more complex and engaging – safety or conservation education programs, neighborhood development, human services – and require a more qualitative approach to evaluation.

The team anticipates that approaching the program access survey this way will yield more useful data comparable across departments, and a more nuanced understanding of what the city’s customers and residents really need and want. Getting members of Bellevue’s disability community to help design the program evaluation will increase the chances of asking the right questions and being able to use the answers effectively to improve city services.

Areas for Further Evaluation:

- ✓ Develop a realistic estimate of the time and staff resources it will take to design and test a thorough program-by-program evaluation of the type being proposed, and analyze the results. Initial estimates proved to be unrealistically short. Experience with a similar citywide diversity and cultural competency survey by other Diversity Initiative staff demonstrates the complexity and magnitude of a multi-department effort. It also highlights the need for consistency and clarity when program evaluations are performed by a volunteer team rather than by a small group of staff as part of their primary job responsibilities.

Recommendations:

- Consider engaging an ADA consultant for focused assistance with survey design and training for the staff who will conduct the qualitative portions of the program access evaluations.

5 CITY FACILITIES TRANSITION PLAN

ADA Requirements:

If there is an architectural barrier to access in a facility built before the ADA standards became effective on January 26, 1992, an agency may remove the barrier to bring the facility up to standard, or may provide access to the programs or services located in that building by other means, including moving them to a fully accessible location.

Any facility built or substantially altered after January 26, 1992 must be readily accessible to and usable by persons with disabilities and built in strict compliance with either the ADA standards or Uniform Federal Accessibility Standards (UFAS). Alterations to a building or portion of a building are fundamental changes to the usability of the facility. Painting, for example, would not be considered an alteration. When part of a building has been altered, the alterations must comply with architectural standards, including creating an accessible route of travel to the altered area. Features along the route, such as restrooms and water fountains, need to be made accessible as well.

The ADA does not require that every part of a facility is accessible (i.e. every restroom stall) but signs directing people with disabilities to the accessible features must be provided.

Where structural modifications are required to achieve program accessibility, a city must create and adopt a transition plan that provides for the removal of these barriers. A transition plan shall, at a minimum, include:

- A description of the physical barriers in the City's facilities that limit the accessibility of its programs, activities, or services to individuals with disabilities;
- A detailed outline of the methods to be utilized to remove these barriers and make the facilities accessible;
- The schedule for taking the necessary steps to achieve compliance with Title II of the ADA. If the time period for achieving compliance is longer than one year, the plan should identify the interim steps that will be taken during each year of the transition period; and
- Identify the official responsible for the plan's implementation.

5.1 CITY FACILITIES: ASSESSMENTS

The City of Bellevue owns more than 300 buildings, but only 30 percent of those have areas designated for public use. In addition to City hall, the city also owns 74 developed parks, with 64 sport courts and 44 playgrounds, as well as outdoor recreation areas, trails, and undeveloped areas. As new buildings are constructed or older facilities are renovated, more city facilities are made ADA-compliant.

The City of Bellevue has, over the years, conducted a number of comprehensive accessibility reviews as well as individual facility assessments and has devoted staff and financial resources to correcting the barriers identified:

5.2. CITY FACILITIES TRANSITION PLAN: City Facilities: Barrier Mitigation

In 1993, the Parks Department conducted an ADA self-evaluation of all buildings open to the public and developed an action plan which was funded the following year.

In 2004 the US Department of Housing and Urban Development conducted a review of the City Hall complex and found the city to be in good compliance with only minor changes required. The City Hall building had been completely renovated, and included standard features such as automatic door openers and drinking fountains installed at a height appropriate for people in wheel chairs, as well as wheelchair accessible counters and self-help computer stations.

In 2011 the Fire Department surveyed the public areas of all nine Fire Stations and found only minor accessibility issues. The survey results are in [Appendix M](#). **** find clean copy**
In 2008, 2012, and 2015, the city contracted with Endelman and Associates, an architectural accessibility firm, to perform detailed accessibility reviews of city facilities. Phases I, II and III covered a total of fourteen facilities, including City Hall and most of the major Park Department public facilities such as community centers, the Aquatic Center, Bellevue Youth Theatre, and visitor centers at most parks. The assessment findings and associated barrier removal activities are discussed in more detail in the next section on barrier mitigation, and the Executive Summaries are in [Appendix N](#).

5.2 CITY FACILITIES: BARRIER MITIGATION

The City of Bellevue has reduced the number and impact of access barriers in city facilities in several ways. New facilities or substantial renovations of existing facilities are fully compliant with ADA standard. Maintenance and smaller renovation projects frequently include accessibility improvements even when not required by the scope of the project. Accessibility is one of the factors considered when planning the seven-year cycle of Capital Improvement Projects for the Parks & Community Services Renovation and Refurbishment Plan, and when creating the annual Renovation Work Plan. The vast majority of facilities used by the public are within the Parks and Community Services budget, as it encompasses not only park and recreation facilities, but also the Community Centers, Northwest Arts Center and Bellevue Youth Theatre.

Barrier removal activities include specific projects to improve accessibility or remove identified high-priority barriers in facilities that are not due for major renovations or replacement for some time.

5.2.1 Barrier removal priorities

The following factors should be considered roughly equally in prioritizing barriers for removal:

- Level of use by the public: Facilities that receive a high level of public use as measured by number or frequency of visits.
- Program uniqueness: Some programs are unique to a building, facility, or park and cannot occur at another location.
- Geographic distribution: By selecting a range of facilities that are distributed throughout the city, the city can ensure maximum access for all residents.

5.2. CITY FACILITIES TRANSITION PLAN: City Facilities: Barrier Mitigation

- Citizen rights: Facilities where services are provided to exercise citizen rights– voting, right to a trial, access to elected officials, etc.
- Citizen responsibilities: Facilities where taxes are paid, permits and licenses are obtained, and where services are obtained.
- Social need: Facilities that meet social needs such as homeless shelters, health clinics, etc.
- Identified complaints: Efforts should focus on identified accessibility complaints.

Priorities for removal of specific barriers in existing facilities are also based on the general priority guidelines specified in the ADA for Title III public accommodations. While overall accessibility efforts for a Title II public entity must be driven by providing access to programs and services when viewed in their entirety, it is reasonable to apply the facility access priorities to city facilities. As listed in 28 CFR 36.304(c), these priorities include:

1. Providing access from public sidewalks, parking, or public transportation. These measures include installing entrance ramps, widening entrances, and providing accessible parking spaces/ signage.
2. Providing access to those places where goods and services are made available. These measures include revising interior routes, adjusting the layout of tables, providing Braille and raised character building signage, widening interior doors, providing visual alarms, and installing ramps.
3. Providing accessible restrooms, such as removing obstructing items on the route to the restroom, providing accessible signage, widening restroom doors, widening toilet stalls, installation of ramps, providing accessible plumbing fixtures, and installation of grab bars.
4. Making other modifications to provide access to the goods, services, facilities, privileges, advantages, or accommodations, such as accessible public phones and water fountains.

5.2.2 Facility Survey Results and Improvement Status

The City received detailed results from each of the three facility accessibility surveys performed by Endelman and Associates, an architectural accessibility consulting firm in 2008, 2012, and most recently in January 2016. Many of the identified barriers have been removed, and the majority have been budgeted for improvement in future years. The tables below give a moderately detailed summary of the major survey findings and the city's actions to correct them. The Executive Summaries of the three survey reports can be found in [Appendix N](#).

5.2. CITY FACILITIES TRANSITION PLAN: City Facilities: Barrier Mitigation

PHASE I: 2008

Facility name & address	Major barriers identified	Status
1. Highland Park and Community Center Building 14224 Bel-Red Road	<ul style="list-style-type: none"> Exterior accessible route, parking & ramps have excessive slopes Restroom fixtures & accessories noncompliant 	<ul style="list-style-type: none"> Parking lot improvements completed, 2012. Accessible route into building fixed. Restrooms in Multipurpose rooms brought up to code
2. Highland Park/Recreation Area 14224 Bel-Red Road	<ul style="list-style-type: none"> Exterior accessible route, parking & ramps have excessive slopes Ballfields lack accessible seating & dugouts 	<ul style="list-style-type: none"> Accessible parking stalls added near skatepark Accessible route from Highland Center to playground fixed Added ADA compliant bleachers at ballfield
3. North Bellevue Community Center 4063 – 148 th Avenue NE	<ul style="list-style-type: none"> Exterior accessible route, parking & ramps have excessive slopes Interior counters too high Restroom fixtures & accessories noncompliant Internal doors lack clearance 	<ul style="list-style-type: none"> Parking lot and exterior route improvements completed, 2012. Small restrooms by kitchen remodel and possible ADA family restroom retrofit budgeted for 2017 (\$50K) Large restrooms near main entry budgeted for remodel, 2019 (\$100K)
4. Route from City Hall to Parking & Transit 450 – 110 th Ave NE	<ul style="list-style-type: none"> Exterior & covered parking and accessible routes have excessive slopes Routes to public right-of-way from parking and transit is too steep & lacks handrails 	<ul style="list-style-type: none"> Not fixed; parking stalls and routes have slopes from 2.7%-4.2%, minimally noncompliant. Exterior parking, plaza, and all routes to parking and sidewalks will be demolished and reconfigured during construction of light rail station starting in 2017.

PHASE II: 2012

Facility name & address	Major barriers identified	Status
1. Bellevue Aquatic Center Site and Facility	<ul style="list-style-type: none"> Exterior routes from parking and sidewalk to main entry have excessive slopes. 	<ul style="list-style-type: none"> Accessible route to main front entry regraded and fixed.

5.2. CITY FACILITIES TRANSITION PLAN: City Facilities: Barrier Mitigation

Facility name & address	Major barriers identified	Status
601 – 143rd Ave NE	<ul style="list-style-type: none"> Blue Lagoon Pool shower area, restrooms and locker rooms have numerous access issues. 	<ul style="list-style-type: none"> ADA-compliant lift chairs for both pools replaced. Blue Lagoon showers structurally unfeasible to fix; provided signage to direct patrons to restrooms & lockers in newer section of building. Interior doors & auto closures replaced in 3 phases: phase 1 complete, phase 2 budgeted for 2018 (\$25K), phase 3 not yet scheduled.
2. Bellevue Botanical Gardens (BBG) - Paths in gardens, route of travel through park, gift shop; excludes caretakers house, parking lot at gardens to be demolished 12001 Main Street	<ul style="list-style-type: none"> Old Visitor Center restrooms have noncompliant fixtures Trails throughout have gravel surfaces that are not accessible Recommend providing program access through accessible golf carts or other small vehicles 	<ul style="list-style-type: none"> Old Visitor Center was demolished. New Visitor Center and Gift Shop built to ADA standards. Accessible trails are noted with signage. Pilot program tested golf cart for tours; found low usage as designed because carts seat only one visitor and available at limited times. Recommend gathering more public input and testing multi-seat carts.
3. Bellevue Golf Course 18 Holes, driving range, putting green, Pro shop 5500 – 140 th Ave NE	<ul style="list-style-type: none"> Too few accessible parking stalls; stalls & path to clubhouse have excessive slope & no compliant landings No path to public right of way Clubhouse pro shop lacks 36" route throughout Clubhouse and golf course restrooms have multiple access issues: clearance, thresholds, noncompliant fixtures Golf course lacks accessible route; recommend accessible golf carts to provide access. Two holes inaccessible due to curbs. 	<ul style="list-style-type: none"> Parking lot restriping budgeted for 2017, may allow for regrading accessible stalls. Golf course restroom renovation budgeted for 2018 (\$75K) New driving range built to ADA standards. Accessible ADA-compliant golf cart available with features that provide access to tees and greens.
4. City Hall Interior Public Areas Only - Concourse, Lev. 2 Training, City	<ul style="list-style-type: none"> Service First and Development Services counters lack lowered sections. 	<ul style="list-style-type: none"> Service First and Permit Processing area redesigned in 2014.

5.2. CITY FACILITIES TRANSITION PLAN: City Facilities: Barrier Mitigation

Facility name & address	Major barriers identified	Status
Mgr., West Wing Flr. 3 Deli 450 – 110 th Ave NE	<ul style="list-style-type: none"> • Women’s restrooms lack maneuvering space, accessible fixtures • Council Chamber has insufficient wheelchair accessible spaces and aisle seats 	<ul style="list-style-type: none"> • Restroom stalls reconfigured. • Seating configuration redesigned in 2016; vendor to complete reconfiguration in mid-2016. • All City Hall restrooms to be completely remodeled and brought into compliance, budgeted for 2017-18.
5. Crossroads Community Park & Center Building Site and Facility - incl. Annex / Golf Course & International Area 16000 NE 10 th Street	<ul style="list-style-type: none"> • Crossroads Park walkways and curb ramps have excessive slopes; playground surface material makes route inaccessible • Community Center: too few accessible parking stalls; stalls, access aisles & path to CC have excessive slopes. • CC Men’s and Women’s main restrooms: some fixtures, stalls and clearances are noncompliant • CC interior doors exceed allowable pull force • Crossroads Golf Course accessible parking stalls, access aisle & curb ramps have excessive slopes • Pro shop entry door & service counter are noncompliant; no accessible route to restrooms which have noncompliant clearance & other features • No accessible route to practice green, driving range, and golf course itself; recommend accessible golf carts to provide access. 	<ul style="list-style-type: none"> • Parking lot reconfigured; restriping of accessible spaces done exactly as before (incorrectly); budgeted for repair in 2016. • North parking lot budgeted for repaving, 2022 (\$215K) • Asphalt walkways budgeted for repair, 2020 (\$130K) and 2021 (\$25K); some may be too steep due to terrain. • Interior door pull weight adjustments added to routine maintenance. • Men’s & women’s restrooms in main center remodeled to ADA standards. • Crossroads golf course restrooms renovation budgeted for 2022 (\$30K)
6. Downtown Park 10201 NE 4 th Street	<ul style="list-style-type: none"> • Southeast parking lot has too few access aisles; all parking lots have excessive slopes on lots and curb ramps. • No accessible route to art installations • Restroom fixtures, grab bars & dispensers noncompliant • Playground lacks accessible route to accessible components 	<ul style="list-style-type: none"> • Large portions of park to be re-done as part of “Complete the Circle” project within the next few years. • Playground will be replaced with new fully accessible Inspiration Playground, developed with Rotary Club, Bellevue Special Needs PTA and other civic partners. Groundbreaking expected Fall 2016, opening to public Spring/Summer 2017.

5.2. CITY FACILITIES TRANSITION PLAN: City Facilities: Barrier Mitigation

Facility name & address	Major barriers identified	Status
		<ul style="list-style-type: none"> • Walkways to be re-paved, 2021 (\$15K) • Restroom near formal garden budgeted for renovation, 2021 (\$65K)
<p>7. Kelsey Creek Farm & Park Barns, features & Site 410 – 130th Place SE</p>	<ul style="list-style-type: none"> • Accessible parking only at lower lot; long distance uphill to main features of barn, animal areas and education rooms. No accessible parking at upper gravel lot. • Path to street, gravel path between upper and lower portion of park, and gravel paths between upper buildings & animal display areas inaccessible due to slope and surface material. • No accessible route to picnic tables. • Playground restrooms inaccessible; clear space, noncompliant fixtures. • Playground lacks accessible route to ground components. • Education areas in converted farmhouse: entry ramp too steep, interior doorways too narrow, upper & lower restrooms inaccessible, and no accessible route to lower level. • Education Barn has steps & level changes with no ramps • Amphitheater lacks wheelchair seating and accessible route to stage. 	<ul style="list-style-type: none"> • Substantial access challenges remain due to hilly terrain, historic buildings, and farmyard areas. • Upper parking lot paved, curb ramps added and accessible stalls created, with signage. • Paths rerouted, budgeted for 2017, (\$25K) • Playground restrooms budgeted for renovation, 2019 (\$115K) • Playground to be completely replaced, 2016 (\$250K) • Education Barn & house interior improvements, 2017 (\$300K) • Farmhouse lower level restrooms partially budgeted for future remodel (\$50K), as part of a larger project to include full ADA and building code upgrades. • Small animal areas budgeted for redesign (\$100K), not yet scheduled • Garden sheds & animal barns budgeted for repair/replacement, 2020 (\$75K)
<p>8. Northwest Arts Center Building 9825 NE 24th Street</p>	<ul style="list-style-type: none"> • Parking lot has excessive slopes and lacks van stall. • Walkways to public right of way and building entry have excessive slopes, lack handrails and level landings. • Interior restroom stalls lack clearance and have noncompliant fixtures. 	<ul style="list-style-type: none"> • Exterior parking, walkways, and doorway renovated to ADA standards. • Interior restrooms budgeted for remodel, 2019 (\$55K)

5.2. CITY FACILITIES TRANSITION PLAN: City Facilities: Barrier Mitigation

Facility name & address	Major barriers identified	Status
	<ul style="list-style-type: none"> Classrooms lack accessible sinks and work tables. Auditorium threshold is noncompliant. 	
<p>9. Robinswood Community Park Incl. Barn, Park House, Cabana, ball fields , concession building, restrooms, tennis center (indoor & outdoor) 2430-32 – 148th Ave SE 2400 – 151st Place SE</p>	<ul style="list-style-type: none"> Park has many routes on sloping terrain that require ramps to be accessible. North end, playgrounds & athletic fields mostly compliant already; accessible trail to pond is feasible but many trails on south end too steep. Robinswood House lacks accessible routes to parking & street, to interior of house and to second floor. Teen Barn restrooms have multiple compliance issues; no accessible route to parking at Robinswood House lot. Tennis Center has no accessible route to the main entrance; excessive slopes and insufficient maneuvering room on routes to tennis courts from inside Tennis Center. Restrooms and locker rooms have multiple compliance issues and showers are not accessible. 	<ul style="list-style-type: none"> Substantial access challenges remain due to hilly terrain and older or historic buildings. Tennis Center entrance remodeled and brought up to ADA standards, including parking, accessible pathway and front entrance. Accessible route to ballfields repaired; added accessible bleacher seating. Accessible route to Dog Park West repaired; created accessible seating area. Parking lot repairs budgeted for 2018 (\$150K), 2019 (\$160K) and 2020 (150K) Robinswood House all interior restrooms budgeted for remodeling, 2020 (\$50K) Patio restrooms budgeted for remodel, 2021 (\$40K) Teen Barn restrooms budgeted for refurbishment, 2018, (\$60K) Ballfield restrooms budgeted for renovation, 2016 (\$60K) Ballfields budgeted for regrading, 2022 (\$20K) Playground budgeted for replacement, 2020 (\$120K) – no major access problems identified with existing one, but new playground will meet newer access standards and more accessible components
<p>10. Wilburton Hill Park Upper and lower parking lot by ball</p>	<ul style="list-style-type: none"> Accessible parking stalls at the ballfield/playground lot have excessive slopes. 	<ul style="list-style-type: none"> Added ADA compliant bleachers at soccer field.

5.2. CITY FACILITIES TRANSITION PLAN: City Facilities: Barrier Mitigation

Facility name & address	Major barriers identified	Status
fields, route connecting to BBG, 2 baseball, 1 soccer, picnic, tot lot, playground <i>12400 Main Street</i>	<ul style="list-style-type: none"> • Walkways to street, ballfields, soccer fields and playground are gravel surface and lack handrails & level landings on slopes; some slopes excessive. • Restroom sinks and mirrors noncompliant • Ballfield bleachers lack companion seats and drinking fountains noncompliant. • Playground lacks accessible route and upper level is substantially noncompliant. 	<ul style="list-style-type: none"> • Playground has been replaced, now complies with 2010 play area standards. • Park restrooms budgeted for renovation, 2022 (\$30K) • McDowell House interior restrooms budgeted for remodel, 2020 (\$30K)

PHASE III: 2016

Facility name & address	Major barriers identified	Status
1. Mercer Slough Environmental Education Center <i>1625 – 118th Ave SE</i>	<ul style="list-style-type: none"> • Exterior accessible route, accessible parking, and walkways exceed recommended slopes. • Platform lift locked and lacks door maneuvering space. • Restroom clearances slightly too small. • Classroom entry door and deck thresholds too high. 	Items will be evaluated, prioritized & budgeted for improvement.
2. South Bellevue Community Center <i>14509 SE Newport Way</i>	<ul style="list-style-type: none"> • Insufficient accessible parking stalls; stalls, access aisles and walkways exceed recommended slopes. • Restroom clearances too small, shower thresholds too high, insufficient clearance. • Classrooms & commercial kitchen lack accessible sinks & work surfaces. • Playground surface material makes route inaccessible; no ground-level components. 	Items will be evaluated, prioritized & budgeted for improvement.

5.2.3 Barrier Removal in Park Improvement Projects

In addition to barrier removal activities related to the ADA facility assessments, a number of renovation and refurbishment activities on park facilities included access improvements. The criteria for selecting projects as part of the rolling seven-year workplan includes accessibility, and any alteration brings the facility up to current ADA standards where structurally feasible.

5.2. CITY FACILITIES TRANSITION PLAN: City Facilities: Barrier Mitigation

Recent park improvement projects include:

2009

- ❖ Playground Replacement – Chandler Park, Collingwood Park, Deer Run Park, Killarney Glen Park, Saddleback Park;
- ❖ Replace Pedestrian Bridge – Kelsey Creek Park;

2010

- ❖ Parking Lot Resurfacing – Kelsey Creek Park;

2012

- ❖ Asphalt Repair s/Overlays/Boardwalks/Pathways - 118th Ave Trail, Robinswood Park, Killarney Glen Park, Bannerwood Park, Lake Hills Park, Lewis Creek Park, Northwest Arts Center, Forest Park – Lower Washout Way (Coal Creek Natural Area), Wilburton Hill Park;
- ❖ Restroom Remodel/Sewer Pump Repairs - Chism Beach Park, Highland Community Center, included ADA-related improvements
- ❖ Shorelines - Clyde Beach Park - swim dock replacement planning/permitting, Meydenbauer Marina Transient Moorage design and permitting;
- ❖ Program Support - Eastgate Park challenge course, South Bellevue Community Center, automatic basketball lowering devices, Kelsey Creek Park education barn & house improvement planning, North Bellevue CC – relocate billiard room & remodel for exercise room;
- ❖ Rebuild Off leash Dog Area - Robinswood Park;

2013

- ❖ Major restroom remodel at the Crossroads CC;
- ❖ 14 Day-Moorage Slips installed at the Meydenbauer Marina, added new ADA-compliant moorage slips, ramps and accessible parking stalls;
- ❖ New safety surface at the Crossroads water play area;
- ❖ Completed the cart path reconstruction program at the golf course.

2014

- ❖ Pavement repairs improved access at Phantom Lake Loop trail, Meydenbauer Beach park parking lot and Crossroads Park parking lot;
- ❖ Install paging system at Crossroads Community Center;
- ❖ Playground repairs/replacement was completed at Crossroads International (spray park surfacing), Forest Glen Park (surfacing), Norwood, (new curbing and wall), Goldsmith (replaced 2-5 yr. old structure) and Tam O'Shanter replace structure;
- ❖ Restroom renovation and new water line at Hidden Valley Park;
- ❖ Completed the Clyde Beach swim dock and Meydenbauer day moorage projects;

2015

5.3. CITY FACILITIES TRANSITION PLAN: City Facilities: Barrier Removal Plans

- ❖ Playground Equipment Replacements – Wilburton Hill, Lakemont Highlands, Cherry Crest Mini and Ivanhoe Sports Field Parks
- ❖ Restroom improvements – Clyde Beach Park – renovate interior, South Bellevue Community Center – renovate showers,
- ❖ Sport court improvements – Highland Park, Lakemont Highlands Park, Lakemont Park, Robinswood Park tennis center exterior courts, and Spiritridge Park,
- ❖ Skate Park improvements – Highland indoor skate park,
- ❖ Sports field improvements - North Robinswood infield,
- ❖ Citywide projects - numerous improvements/repairs to asphalt walkways, trails and parking lots and replacement of park furnishings.

5.2.4 ADA-specific Barrier Removal Projects

Some projects were undertaken solely to improve accessibility, often in response to a barrier identified through facility surveys, public comments, or staff observations. The number of ADA-specific projects is small because most facilities with access barriers have deficiencies in other areas as well, and are selected for renovation and refurbishment for multiple reasons, not just access.

Recent ADA-specific projects include:

2009

- ❖ ADA Ramp – Kelsey Creek Park (Frasier Cabin);

2014

- ❖ Accessibility Improvements at Northwest Arts center, design work for parking and entry access;
- ❖ Accessible parking and access ramps at Robinswood Tennis Center
- ❖ Interior modifications and acoustical improvements were made at the Highland Community Center.

2015

- ❖ ADA restroom upgrades – Clyde Beach Park restroom;
- ❖ Parking lot and main entry access improvements – Northwest Arts Center

5.3 CITY FACILITIES: BARRIER REMOVAL PLANS

5.3.1 Data Integration and Progress Monitoring

A specialized ADA SurveySolutions database contains detailed ADA compliance data from the sixteen facility accessibility surveys performed by architectural accessibility consultant Endelman and Associates. This database identifies each specific barrier, makes recommendations about mitigation,

5.3. CITY FACILITIES TRANSITION PLAN: City Facilities: Barrier Removal Plans

provides priority rankings and budget estimates, and can be used to track the progress of barrier removal. The city has its own tracking systems for facility maintenance, renovation and remodeling projects, for both capital projects and those carried out with operational funding. Data must be manually transferred between systems by updating the ADA SurveySolutions as projects are completed and barriers are removed. The project scope and completion data in the city's systems do not always contain the level of detail required to determine whether barriers have been removed; staff must rely on other documentation or on their knowledge of each project in order to evaluate and properly record this information. This has resulted in delays in keeping the information up to date. Several Parks staff are currently correlating and updating all data in order improve the usefulness of the ADA SurveySolutions software. When complete, this will allow for more efficient monitoring of progress, as well as make it easier to sort and prioritize future barrier removal projects. With hundreds of pages of detailed survey findings for fourteen different facilities, the sorting and analysis functions are essential tools.

5.3.2 Short-term Barrier Removal Plans

Many future projects in the Parks and Community Services Department's 2016-2022 Renovation and Refurbishment Plan include accessibility improvements, and a few are planned specifically to address accessibility needs.

Upcoming projects that include accessibility improvements in 2016 include:

- ❖ Picnic shelters – Create covered picnic shelter at Enatai Beach Park
- ❖ Playground Equipment Replacements – Bellevue Botanical Garden, Skyridge, Goldsmith, and Kelsey Creek parks;
- ❖ Shorelines and docks – New dock at Mercer Slough Environmental Education Center, permitting and design for 5 docks, and complete redesign of Swayolocken boat launch area for construction in 2017.
- ❖ Trail improvement – citywide trail improvement projects, to include prioritization of accessible trails and creation of a guide to accessible trails

Upcoming ADA-specific projects in 2016 include:

- ❖ Accessibility improvements – regrading to create accessible trail at Zumdieck Park
- ❖ Restroom renovation – remodel entire restroom at Zumdieck Park
- ❖ Sport court improvements – install ramp to sport courts at Cherry Crest Park

5.3.3 Medium- and Long-term Barrier Removal Plans

The City of Bellevue plans to apply a more strategic and systematic approach to prioritizing and accomplishing future access improvements for city facilities. The facility assessment results are an important source of information and will be more useful once the ADA SurveySolutions database is fully updated and can be used to generate status reports. Public outreach and engagement activities will

5.3. CITY FACILITIES TRANSITION PLAN: City Facilities: Barrier Removal Plans

solicit information about what city facilities and services are most important to Bellevue residents and visitors, and identify specific problems they have encountered. Data from the public surveys and comments will be combined with facility usage data to create a preliminary priority ranking for future ADA projects. Along with major priorities, staff will identify a punch list of smaller items that can be done in batches in the near-to-mid-term.

Prior to the 2017 update to the Parks and Community Services Renovation and Refurbishment Plan and the submission of 2017-2018 biennium budget requests, the ADA Core Team will work with staff from Parks and Community Services, Civic Services, and other departments to apply accessibility criteria to each element of the long-range plan for facilities. Each category can be evaluated separately to promote a more useful analysis and meet satisfy public desires more effectively. For example, an overall plan for increasing playground access could determine whether it is better to spread resources around by providing a few access enhancements in each playground, or to concentrate resources to by meeting basic accessibility standards in all playgrounds while creating fully immersive and inclusive environments in a smaller number of playgrounds that may be better suited to access because of size, topography, location, or usage patterns.

There are over 50 projects planned for 2017 through 2022 that will have barrier removal impacts, summarized in the table below. For a full list, please see [Appendix O](#).

5.3. CITY FACILITIES TRANSITION PLAN: City Facilities: Barrier Removal Plans

City of Bellevue Parks Renovation Projects with ADA Impact, Planned 2017-2022						
	2017	2018	2019	2020	2021	2022
Parking			Forest Glen Nbrhd Park	Evergreen Park		Crossroads Park
Walkways & trails	Kelsey Creek	Robinswood Park	Robinswood Park	Ashwood Park; Crossroads Park; Robinswood Park	Downtown Park; Wildwood Park	
Buildings	Kelsey Creek; North Bellevue CC	Aquatic Ctr; Robinswood Barn	North Bellevue CC; Northwest Arts Center	Kelsey Creek; Robinswood House; Wilburton McDowell House	Lewis Creek Park; Meydenbauer Marina; Robinswood Patio	Aquatic Ctr Highland CC; Robinswood House
Playgrounds		Crossroads Int'l Park; Downtown Park; Forest Glen Nbrhd Park; Foresthill Nbrhd Park; Newport Hills Comm Park; Saddleback Park	Evergreen Park; Lattawood Park	Clyde Beach Park; Lewis Creek Park; Northtowne Park; Robinswood Park	Chism Beach Park; Highland Park; Ivanhoe Park; Newcastle Beach Park; Spiritridge Park; Sunset Park; Zumdieck Park	Cherry Crest Mini Park; Enatai Nbrhd Park; Lake Hills Comm Park; Sixth Street Park
Sport courts & playfields	Lewis Creek Park;	Lakemont Comm Park	Highland Park; Lake Hills Comm Park			Robinswood Park
Park restrooms		Bellevue Golf Course; Enatai Nbrhd Park	Kelsey Creek Park		Downtown Park; Robinswood Park	Crossroads Park; Lake Hills Greenbelt; Overlake Blueberry Farm; Wilburton Hill Comm Park
Shoreline access	Sweyolocken Boat Launch	Clyde Beach				

6 SIDEWALK AND CURB RAMP TRANSITION PLAN

ADA Requirements:

Accessible pedestrian facilities within the public rights of way enable people with disabilities to reach their desired destinations and to enjoy the benefits of city services, programs, and activities. Where sidewalks and curb ramps are provided, public agencies are required to ensure these facilities are installed to be accessible and maintained to be free of obstructions.

Title II requires state and local governments to make pedestrian crossings accessible for people with disabilities by providing curb ramps. A curb ramp provides a way for people to transition from a roadway to a curbed sidewalk and vice versa. Agencies must provide curb ramps at locations where walkways intersect a curb. To comply with ADA requirements, curb ramps must meet specific standards for width, slope, cross slope, placement, and other features.

Accessibility of the public rights of way requires more than curb ramps that comply with the standards. Title II also covers all features within publicly-owned pedestrian paths of travel, including sidewalks, crosswalks, street furnishings, pedestrian signals and parking.

Similar to the distinction made for architectural facilities, the ADA treats pedestrian facilities that were built before the law went into effect on January 26, 1992 differently than those built or altered after the law. Cities must upgrade or retrofit the pedestrian facilities built pre-ADA as needed to provide program access. All pedestrian facilities built after the ADA was enacted and all alterations to facilities within the public right of way built before 1992 must meet ADA standards. The standards for curb ramp construction have been changed several times, so some ramps constructed after the ADA do not comply with current standards. However, “safe harbor” provisions apply to ramps that complied with standards in effect when they were constructed, and they do not need to be altered to comply with present standards.

In their ADA Transition Plans, state and local governments must list physical barriers to accessibility, describe the methods used to remove the barriers, and provide a schedule for taking steps to achieve full compliance with the ADA. For pedestrian facilities, this means assessing all streets and sidewalks in the public right of way, listing the barriers discovered, and creating a plan for mitigating or removing these barriers by providing accessible paths of travel on sidewalks and curb cuts.

6.1 PEDESTRIAN FACILITIES: ASSESSMENTS

The City of Bellevue’s Transportation Department has been incorporating ADA standards and best practices into its projects for many years. Over time, emerging guidance on ADA standards has been integrated into the Transportation Design Manual, Inspection Standards, and other procedural references so that ADA requirements are a set element in design, plan reviews, and construction contracts, and inspection. Staff members look for innovative and cost-effective ways to advance accessibility for people with disabilities who rely on the city’s pedestrian facilities to access their homes,

6.1. SIDEWALK AND CURB RAMP TRANSITION PLAN: Pedestrian Facilities: Assessments

employment, transit, and other destinations. The Transportation Department’s ADA Programs Team (ADAPT) meets monthly to review ADA-related projects, and share information, and coordinates with the citywide ADA Core Team.

Overall, the City of Bellevue has 346 miles of city-owned sidewalks. Virtually all signalized intersections with sidewalks also have curb ramps, but it is estimated that about 80% of existing ramps are noncompliant because they were installed under obsolete standards or did not meet standard at the time of installation. Many residential neighborhoods do not have sidewalks at all; these tend to be primarily older developments built in the 1950s through 1970s or areas that have been annexed from King County. The Transportation department has a neighborhood sidewalk program to install new pedestrian facilities in older neighborhoods. Community input is one of the factors used in the determination of the sidewalk locations. Bellevue’s terrain is hilly, with many streets and sidewalks on steep grades, so it is challenging to make intersections and curb ramps fully accessible in some locations. The Transportation Department strives to make all pedestrian facilities as accessible as possible in such circumstances, and has developed guidelines for making “maximum extent feasible” (MEF) determinations in difficult locations. Having a consistent methodology for balancing different access features clarifies and streamlines the engineering process and provides consistency across locations. Not all cities do this, and Bellevue’s transportation engineers have sought out more advanced technical assistance to help with this process.

The pedestrian facilities section of the self-evaluation is broken down into three sections:

Assessment activities:

- Sidewalk and curb ramp self-evaluation report
- Accessible pedestrian signals report
- Curb ramp quality control and monitoring

Barrier mitigation activities:

- Pavement overlay projects
- ADA pedestrian facilities compliance program
- Capital Improvement Projects
- Private developments & Franchise utility work in the Right of Way
- Street maintenance
- Accessibility during construction
- Public transit coordination

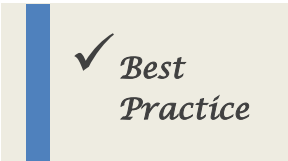
Barrier removal plans:

- Data integration and progress monitoring
- Pavement overlay candidate projects
- ADA pedestrian facilities compliance projects
- Other plans for barrier removal

6.1. SIDEWALK AND CURB RAMP TRANSITION PLAN: Pedestrian Facilities: Assessments

6.1.1 Sidewalk & Curb Ramp Self-Evaluation Report

In 2006 when the city considered how to update its sidewalk and curb ramp assessment, Transportation Department staff contacted jurisdictions across the country to gain insight into effective approaches to data collection. Staff determined that using existing manual measurement methods could cost the city up to \$1 million for a detailed evaluation of barriers to access within the public rights of way. Staff then identified a promising technology under development at the Federal Highway Administration's Office of Pavement Technology. This Ultra-Light Inertial Profiler (ULIP) mounted on a Segway Human Transporter operates at about 10 mph and performs laser measurements of pavement surfaces while an attached on-board computer collects data. The technology had initially been used to measure surface defects on highway and airport pavement surfaces but had never been used for municipal ADA compliance assessments.



✓ *Best
Practice*

In 2007, the City began testing the efficacy of the ULIP technology for obtaining precise measurements of grade, cross-slope, and vertical displacements. Staff conducted extensive data verification by correlating the ULIP results with GIS and location results and traditional measurement techniques; the ULIP data was consistent, accurate, and far more detailed than previous methods. In 2008, the technology was used to formally inventory all 336 miles of city-owned sidewalks. More than 4,000 existing curb ramps were also evaluated by field staff using traditional smart level and GPS technologies. This complete sidewalk and curb ramp inventory was completed for less than \$400,000.

Once the raw data was collected, non-compliant features were then prioritized using a detailed barrier ranking analysis. An impedance score based on the severity of the access problem was combined with an activity score based on priority rankings gathered from an extensive public survey and focus groups that collected over 110 responses from Bellevue area residents with disabilities.

**** insert graphic showing barrier ranking process**

In 2009 the results were published as *Toward Universal Access: Americans with Disabilities Act Sidewalk and Curb Ramp Self-Evaluation Report*. (See [Appendix P](#) for executive summary) Bellevue's use of innovative technology to accomplish a detailed inventory of barriers at relatively low cost was recognized as a best practice in the National Cooperative Highway Research Program. In 2012, the report won a Transportation Planning Excellence Award, sponsored by the Federal Highway Administration and Federal Transit Administration and co-sponsored by the American Planning Association and Transportation Research Board.

The Texas Transportation Institute praised the report and stated: "Efforts such as those at the City of Bellevue, Washington, rely on the collection of large datasets at extremely fine spatial and temporal disaggregation levels have the potential to significantly automate the identification of non-compliant locations in the field."

6.1. SIDEWALK AND CURB RAMP TRANSITION PLAN: Pedestrian Facilities: Assessments

Performing a detailed assessment of pedestrian facilities is typically the most expensive and labor-intensive portion of any public entity’s ADA self-evaluation; many jurisdictions have not done thorough surveys, or have not updated them frequently enough to generate really useful data or target their barrier removal efforts efficiently for the greatest public benefit. Using the ULIP technology pioneered by Bellevue has enabled other cities and counties to perform sidewalk and curb ramp surveys more quickly and at a fraction of the cost, leading to better resource decisions and better access outcomes.

**** insert graphic/table summarizing results of sidewalk and curb ramp report**

6.1.2 Accessible Pedestrian Signals Report

One pedestrian feature within the public rights of way that was not evaluated in the sidewalk and curb ramp inventory was Accessible Pedestrian Signals (APS) at signalized intersections. APS provide audible and/or vibro-tactile information coinciding with visual pedestrian signals to inform visually impaired pedestrians precisely when the WALK interval begins and when it is no longer safe to cross. Audible signals can also provide directional guidance, which is particularly useful at skewed or angled intersections and at wide multi-lane crossings. The city incorporates APS at signalized intersections in response to citizen requests, significant alterations to an existing signal or corner geometry, or as new intersections are brought into the signalized network. Standards for APS were updated when the Manual for Uniform Traffic Control Devices (MUTCD) was revised in 2009; the City of Bellevue began to use the newer and still-current standards in 2012 as required. There are no ‘safe harbor’ provisions for APS to allow items constructed or installed in compliance with a previous standard to be deemed in compliance after the standards have changed.

A secondary inventory effort to evaluate the compliance of currently installed APS was completed in 2012. It examined all signalized intersections, assigned priorities for additional APS installation and evaluated existing APS for compliance and possible upgrade to the newer standard.

Since 2013, new APS have been installed in many locations, often in conjunction with overlay projects on existing or new signalized intersections. The following chart shows the growth in the number and percentage of intersections with APS over the last five years:

Bellevue Audible Pedestrian Signals			
Year	Number of Intersections with APS	Number of Signalized Intersections	Percent of Intersections With APS
2012	72	186	39%
2013	75	187	40%
2014	107	191	56%
2015	133	196	68%

The Accessible Pedestrian Signals report is included in [Appendix Q](#).

6.2. SIDEWALK AND CURB RAMP TRANSITION PLAN: Pedestrian Facilities: Barrier Mitigation

6.1.3 Curb Ramp Quality Control and Monitoring

Sometimes curb ramp or sidewalk renovation or mitigation projects, once constructed, still do not achieve full compliance with ADA standards. Construction is carried out by contractors according to city contract scope and direction. In 2009, Transportation staff undertook an evaluation of curb ramp compliance to better understand why some ramps failed to meet standards upon completion. The analysis of two phases of curb ramp upgrades completed in 2008 is summarized in the following table:

2008 Curb Ramp Upgrade Analysis		
Category	Phase 1	Phase 2
New fully compliant ramps	36	16
New ramps not fully compliant due to influences of roadway slopes at corners	46	59
New ramps not fully compliant due to constraints surrounding the ramp (island, existing sidewalk, driveways, poles, etc.)	9	10
New ramps that could have been compliant	10	17
TOTAL	101	102

As a result of this analysis, department staff modified how the curb ramp concrete contracts were scoped, invested more in the upfront design of curb ramps rather than simply assigning a "type" to the location in plans, encouraged inspectors to attend ADA trainings, and created a procedure for documenting when a curb ramp is constructed to the maximum extent feasible.

6.2 PEDESTRIAN FACILITIES: BARRIER MITIGATION

6.2.1 Pavement Overlay Projects

Each year the City of Bellevue undertakes major pavement improvement projects on roadway portions selected for their importance to vehicle and pedestrian circulation, role in the city's overall transportation network, and maintenance or upgrade requirements. Each overlay project includes reconstruction or retrofit of every ADA noncompliant curb ramp, additional ramps where required, and signage and accessible pedestrian signals installed on all signalized crosswalks. The cumulative impact of overlay projects is significant, and the majority of ramp and sidewalk upgrades are performed as part of overlay projects rather than as stand-alone ADA projects. PW-M-1, the annual Overlay Program budget is the Transportation Department's largest ongoing program budget. The construction budget for the annual overlay & ADA upgrades construction projects ranges from \$3.5 million to \$4.5 million per year. It is estimated that the ADA component of the overlay program construction cost can account for as much as 25% of the total contract.

The City of Bellevue utilizes a web-based pavement management system. The pavement management system assists staff in developing the Overlay Program and ensuring those streets needing repairs are addressed in priority fashion. Through the use of the pavement management system, the City is able to predict the timing and level of pavement deterioration. This allows City resources to be utilized in the most efficient manner. The information required to develop the pavement management system's 5-year resurfacing plan comes from the biennial Pavement Distress Survey. In this survey each street is field reviewed and rated to monitor the condition of the pavement.

6.2. SIDEWALK AND CURB RAMP TRANSITION PLAN: Pedestrian Facilities: Barrier Mitigation

During the design phase of Transportation Projects, ADA access is reevaluated and ADA sidewalk ramps, sidewalks, roadway crossings and Audible Pedestrian Signals (APS) systems are reconstructed, constructed new or retrofitted as determined necessary along street resurfacing projects and Capital Improvement Projects. Since the conclusion of the 2009 sidewalk and curb ramp self-evaluation the following progress has been attained in the Programs mentioned below and indicated in the

From 2010 to 2015, approximately 140 lane miles of roadway were re-paved: 107 lane miles of these were major arterials or neighborhood collectors carrying heavy pedestrian traffic, including NE 8th Street and 148th Ave NE, and 33 lane miles were residential streets. The chart below shows a summary of overlay projects and Pedestrian Compliance Program projects completed post 2009. Of the over 700 ADA sidewalk ramps constructed by the Overlay Program and the ADA Pedestrian Compliance Program since 2010, most ramps replace existing ADA ramps that were non-compliant or non-existing ramps at crossings. Those ramps that could not be constructed as fully compliant will be reevaluated in the ongoing self-evaluation process through the ADA viewer.

Maps of overlay projects for 2010-2015 and planned projects overlay candidates for the next five years, 2016 – 2020, are found in [Appendix R](#).

6.2. SIDEWALK AND CURB RAMP TRANSITION PLAN: Pedestrian Facilities: Barrier Mitigation

Year	Transportation Program Funding Source	# Ramps Constructed, Reconstructed or Retrofitted	Project comment
2010	Overlay Program	113	Roadway resurfacing project included 9.25 lane miles of collector/arterials 18.7 lane miles of residential streets
2010	Pedestrian Compliance	5	Residential neighborhoods
2011	Overlay Program	86	Roadway resurfacing project included 20.85 lane miles of collector/arterials 3.13 lane miles of residential streets
2011	Pedestrian Compliance	11	3 ramps at intersection of major arterial roadway near college, 8 ramps in residential neighborhoods
2012	Overlay Program	85	Roadway resurfacing project included 23.37 lane miles of collector/arterials 0.3 lane miles of residential streets
2012	Pedestrian Compliance	0	Budget expended in prior & following year
2013	Overlay Program	89	Roadway resurfacing project included 15.77 lane miles of collector/arterials 1.4 lane miles of residential streets
2013	Pedestrian Compliance	11	Residential neighborhoods
2014	Overlay Program	239	Roadway resurfacing project included 17.59 lane miles of collector/arterials 3.89 lane miles of residential streets
2014	Pedestrian Compliance	8	Mid-block crossings near transit stop and High School
2015	Overlay Program	78	Roadway resurfacing project included 19.91 lane miles of collector/arterials 5.36 lane miles of residential streets
2015	Pedestrian Compliance	4	Collector connecting neighborhood to CBD
Total number ADA sidewalk ramps Constructed/Reconstructed 2010-2015 with ADA Compliance& Overlay Projects		729	Total roadway resurfacing projects included 106.4 lane miles of collector/arterials 32.78 lane miles of residential streets

6.2. SIDEWALK AND CURB RAMP TRANSITION PLAN: Pedestrian Facilities: Barrier Mitigation

6.2.2 ADA Pedestrian Facilities Compliance Program

In addition to the planned curb ramp and sidewalk access replacements and improvements through overlay projects, the city has a budget for specific ADA-related barrier removal projects that would not otherwise be done through other programs or funding sources. The Pedestrian Facilities Compliance Program (PW-W/B-49) was funded at \$50,000 per year from 2000 through 2011, when it was increased to \$100,000 per year. These are generally projects that are responsive to an identified high-priority barrier, and requests from mobility-impaired residents are given the highest priority. When possible, projects are coordinated with Utilities and Street Maintenance to minimize conflicts and maximize the number of ramps that can be built each year by working in zones.

A formal project selection process ([Appendix S](#)) was developed in 2011 but has not been used since 2013 when the ADA Viewer software for curb ramp survey data became unavailable. Since then, projects have been selected through an informal process combining input from city staff and requests from the community. The cost per ramp has risen significantly in recent years as construction costs have risen with the rebounding economy, so the program can cover a maximum of six to ten ramps per year.

6.2.3 Street Maintenance, Private Developments, Utility and Parks

Street Maintenance crews regularly mitigate sidewalk heaves (more than 800 per year) created by vertical displacements between sidewalk panels or caused by tree roots. Accessibility enhancements and maintenance of sidewalks and curb ramps are also completed by private development, franchise utilities, and Parks and Utilities Department projects.

Any new construction or alteration of the public right of way triggers an obligation to bring the pedestrian facilities up to ADA standards. When private developments or utility work require constructing or renovating pedestrian facilities – sidewalks, curb cuts, or crosswalks – an accessible path of travel must be created. When a development or project is on an intersection, it must provide an accessible route across the street, which means ensuring that curb ramps on both sides of the adjacent crosswalks are fully compliant. However, a private developer is not required to make alterations or upgrades to the corner diagonally across from the development, because that corner is not on the path of travel to/from the project.

Utility projects or trenching that cut into a portion of a sidewalk or pedestrian path may be considered maintenance projects, but may trigger ADA upgrade obligations if the scope is large enough or if the project cuts into a non-compliant curb ramp.

A significant amount of new commercial development has occurred in Bellevue in the last five years, and more is planned in the near future as the Spring District and Eastgate transit-oriented development is built. All of these developments and infrastructure upgrades such as new main sewer lines recently installed on Bellevue Way, result in new curb ramps and improved sidewalk access. These projects are in addition to the city's planned overlay and ADA compliance activities, and they increase the number and percentage of curb ramps that are fully compliant.

6.2. SIDEWALK AND CURB RAMP TRANSITION PLAN: Pedestrian Facilities: Barrier Mitigation

6.2.4 Accessibility during Construction

No matter whether it is a public- or private-entity initiating the accessibility improvement, the Right of Way Use Permit issued to support the project contains explicit instructions for maintaining pedestrian access during construction. See [Appendix H](#) for the attachment to the permit describing actions that must be taken. This process, and its application in the field, was heralded as a best practice by Federal Highway Administration reviewers in their 2006 report on ADA Title II compliance by Washington State local agencies.

Current observations indicate that lack of accessibility around construction sites is a frequent cause of calls and complaints from Bellevue residents, and that city departments involved typically respond promptly and effectively. These calls may not be formally tracked but on at least two occasions in 2015, they were resolved quickly: A street maintenance crew mistakenly blocked off a curb ramp and opened it the same afternoon within hours of a resident complaint. Parking construction at a county facility in a leased private building had blocked the only accessible entry from the sidewalk; a resident called because she believed it was operated by the city. Bellevue staff were able to contact the property manager and restore access by the next morning when prior attempts by county staff had been unsuccessful. Observations also indicate that Development Services staff respond with similar alacrity to construction-related access complaints for interior building permits, an example of a good practice in one area carrying over to resolve similar problems in another area.

6.2.5 Public Transit

Public transportation systems must be accessible to people with disabilities. Regulations are issued by the Federal Transit Administration (FTA), and govern the design of transportation vehicles, stations, and facilities, the paths of travel and connection to surrounding destinations, and the requirement for reasonable modification to policies and procedures when necessary to provide access. The FTA regulates fixed-route transit and demand-responsive paratransit services for people with disabilities who cannot effectively be served by the fixed-route systems.

The City of Bellevue does not directly provide any public transit services, but works closely with local transit authorities such as Sound Transit and King County Metro to ensure smooth coordination between transit projects and city pedestrian facilities. The location of bus stops or other transit nodes is an important part of the priority ranking system for pedestrian access, and often influences which curb ramps or sidewalks will be upgraded first.

With Eastlink light rail construction in Bellevue starting in 2016, the City will expand its coordination to encompass the new facilities and infrastructure. This includes ensuring accessible paths of travel between transit stops and city facilities or other areas of high pedestrian activity, collaborating on the design of adjoining portions of the right of way, and negotiating specific pedestrian features or connectivity in the portions of a project to be constructed by Sound Transit and later turned over to the city for ownership or maintenance.

6.3. SIDEWALK AND CURB RAMP TRANSITION PLAN: Pedestrian Facilities: Barrier Removal Plans

6.3 PEDESTRIAN FACILITIES: BARRIER REMOVAL PLANS

6.3.1 Data Integration and Progress Monitoring

The sidewalk and curb ramp data from the 2009 self-evaluation is in a GIS database created during the project to allow viewing of sidewalk details and accessible paths of travel. The specialized equipment that was utilized for the sidewalk compliance survey collected data in a different format than the sidewalk and curb ramp data generated by the Transportation Department's annual overlay projects and ADA compliance program. The 2009 data had not been updated or correlated with the other curb ramp data, and the software platform is no longer supported. The original survey data has been migrated into a new web based map. Records of ADA sidewalk ramp improvements are maintained for individual Capital Improvement Projects, ADA Compliance Program, Annual Overlay Program and the Right of Way Use permit process. These as-built documents of the improvements completed after the original survey are in the process of being documented within the ADA viewer web map. Finalizing this step will allow staff to assess current progress towards compliance on facilities within the Right of Way.

Once that process is complete, it will be possible to evaluate barrier mitigation progress more accurately and determine how many of the high-priority items have been addressed. Work towards this end is planned to be complete before the end of 2016.

The cityscape has changed a great deal since 2009, with significant new roads, housing and commercial development, transit route alterations, light rail construction and plans for several major neighborhood redevelopment projects that will change circulation patterns throughout the city. It will be necessary to re-evaluate the barrier priority rankings and consult with the disability community in Bellevue and the surrounding areas to determine how demand has shifted. Usage of pedestrian facilities will continue to change rapidly over the next few years as these major developments are completed, so the city will need to plan for continuous public input and be able to quickly integrate new information into barrier removal activities.

6.3.2 2016- 2020 Overlay Project Candidates

Pavement overlay projects projected for the upcoming five-year period will cover approximately XX lane miles of road, and will reconstruct or renovate an estimated XX curb ramps. The attached map in [Appendix R](#) shows the locations of the candidate projects. Highlights include upgrades near Crossroads Mall, Factoria Mall and downtown Bellevue, with major work planned in Eastgate and the Bel-Red area towards the end of the period to coincide with the construction of the light-rail stations. A variety of residential streets will be upgraded, including several near small neighborhood shopping centers such as Village Park and Newport.

These pavement overlay project candidates were selected on the basis of a number of factors: maintenance needs as indicated by pavement monitoring, improvements to pedestrian facilities in commercial districts, and improvements in areas of major new development. Pedestrian access was a factor in these decisions, but with the results of the ADA viewer upgrades and a renewed public input process, it is possible that the priorities will change. The selection process for future overlay projects will

6.3. SIDEWALK AND CURB RAMP TRANSITION PLAN: Pedestrian Facilities: Barrier Removal Plans

benefit from more robust data on barrier removal achievements and community needs, and may be able to target more high-priority barriers without compromising other project selection criteria.

6.3.3 Future ADA Compliance Projects

Funding for the annual ADA Pedestrian Facilities Compliance Program is anticipated to remain at \$100,000 per year. Future year projects will be determined by community requests and identified high-priority barriers that are not addressed by other means.

7 RECOMMENDATIONS

These are broad general recommendations that have emerged as overall themes during the process of compiling the self-evaluation and transition plan.

7.1 COORDINATION AND IMPLEMENTATION

All public entities with more than fifty employees have a designated ADA Coordinator. Many cities and counties also have ADA Coordinators designated for each department or administrative unit, or at least for those units with substantial ADA-related responsibilities such as oversight of facilities, public rights of way or major programs serving the public. The City of Bellevue does not currently have ADA Coordinators designated for specific city departments, though there are project teams and individuals with responsibility for ADA compliance programs in the Transportation Department and the Parks and Community Services Department.

- As part of future self-evaluation activities, the city should assess whether establishing formal ADA Coordinator designations for some or all departments will improve communication and make compliance activities more efficient.

The 2009 Sidewalk and Curb Ramp Self-Evaluation Report and the three phases of ADA facility assessments yielded extremely detailed and useful data with which to plan further compliance efforts. In both cases, however, the data is in a different format than comparable information used by the Transportation Department and the facilities maintenance and capital planning functions in the Parks & Community Services and Civic Services departments. While there are valid reasons for the differences in data presentation, it does require additional staff work to interpret the data, compare it to records of completed and upcoming projects, and keep multiple systems updated.

- Decisions on future accessibility consulting or evaluation contracts should include a plan for optimal use of the results, and an estimate of required staff resources.

Less than half of the cities in the Seattle metro area have dedicated ADA Coordinator staff positions. Within the first year of Bellevue's hiring an ADA Coordinator, other cities have sought information and assistance on park accessibility, communications access, hearing loops, the curb ramp program, and the development of this ADA Self-Evaluation and Transition Plan. Bellevue is currently taking the lead in organizing collaboration among ADA coordinators in the Seattle area, and has the opportunity to leverage regional resources to improve accessibility and ADA compliance among other cities. Improvements in transportation access, city policies, housing accessibility, promotion of entrepreneurship and accessible technology innovation, and coordinated lobbying efforts are possible outcomes of increased regional collaboration.

- Bellevue should continue exploring the establishment of a formal or informal ADA Coordinators network that would share information and resources, and work together to address regional problems.

7.2 DISABILITY COMMUNITY PARTICIPATION

Participation of individuals with disabilities is listed as one of the first requirements for ADA Title II implementation, and with good reason. The purpose of a city government is to serve the people, and one cannot serve the people well if one does not know what they need and want. At all phases of developing and implementing access policies, making resource and budget decisions, setting priorities for barrier removal, investing in technology and services to improve access, the first and most important question should be: how well does this serve people with disabilities here in Bellevue? Building and nurturing robust relationships with individuals and organizations, and maintaining consistent open two-way communication is critical to answering this question and getting the best results for the people of Bellevue. The next phase of implementation should focus on broadening and deepening the city's engagement with the disability community and developing meaningful ways for their participation to shape the city's ADA evaluation and implementation.

- Bellevue should investigate the possibility of creating a disability or ADA advisory board, on a model similar to the Bellevue Network on Aging, the Bellevue Diversity Advisory Network, or a more formal commission structure similar to Seattle's Commission for People with Disabilities.

7.3 INTERNAL COMMUNICATION AND RESOURCES

City employees must be knowledgeable about ADA requirements in order to respond promptly and appropriately to resident and customer accessibility needs and requests. A thoughtful approach is needed for determining the best ways to communicate ADA requirements and resources to city employees: tactics for reaching employees among the information overload, and strategies for communicating why this is important for city residents and customers. Different strategies & tactics will be useful for employees in different areas – field staff, direct customer service staff.

Ways to communicate with employees

- Email
 - Intranet (Inside Vue, SharePoint sites)
 - Banners and posters in City Hall
 - Mail to employee residence
 - City gatherings (like State of the City)
 - New employee training (setting the standard for expectations)
 - Video (example: Brad's YouTube New Year Message)
 - Department newsletters and blogs
- The city should develop an internal communications plan to reach employees most effectively with the appropriate information when they need it.

7.4 TRAINING

Develop a comprehensive ADA training plan for the entire city to address the common and unique training needs of each department. Most subject areas and departmental reviews indicate a need and desire for some sort of training on disability awareness, communication, resources, compliance, or specific technical assistance.

The training plan should include:

- An analysis of training needs based on factors such as job function, public contact, or subject matter expertise.
- Specific modules on customer service, communications, disability awareness

A training plan could include a combination of in-house training, professional training consultants, and specialized technical training in IT, HR, transportation or construction topics.

END

8 APPENDICES

**** keep appendices as separate documents until merged for final report**

- A. Diversity Advantage Plan Recommendations
- B. Designation of ADA Coordinator
- C. Online accessibility forms
 - 1. Online accessibility request form
 - 2. Wheelchair ramp request form
 - 3. ADA complaint procedures
- D. Proclamations
 - 1. 1992 ADA Proclamation and Policy
 - 2. 2015 ADA 25th Anniversary Proclamation
 - 3.
- E. December 2007 ADA Outreach Meeting Notes
- F. ADA Open House Flyer 4-29-09
- G. Bellevue 2009 ADA Survey Compilation
- H. Pedestrian Access During Construction
- I. Police Department Policy – Communicating with Deaf and Hard of Hearing Persons
- J. Adaptive Recreation Program Descriptions
- K. 2008 Choices for People with Disabilities Plan ****replace with 2016 Choices Plan when completed**
- L. Managers' Survey Results Summary
- M. Fire Station Survey **** find clean copy**
- N. Endelman & Associates Facility Surveys
 - 1. Phase I Survey Executive Summary **** find electronic copy**
 - 2. Phase II Survey Executive Summary
 - 3. Phase III Survey Executive Summary
- O. Parks Renovation Projects with ADA Impact 2017-22
- P. Towards Universal Access: ADA Sidewalk and Curb Ramp Self-Evaluation Report, 2009 – Executive Summary
- Q. Accessible Pedestrian Signals Inventory, 2012
- R. Pavement Overlay Projects: Curb Cuts
 - 1. Map of Pavement Overlay Projects 2010-15
 - 2. Map of Proposed Pavement Overlay Projects 2016-2020
- S. ADA Pedestrian Facility Project Selection Process

ADA 25th Anniversary Brochure